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# Stakeholder Consultation





# Stakeholder Consultation

Prepared by: PricewaterhouseCoopers

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## Executive Summary

The purpose of this report is to provide the Minister of Municipal Affairs and the Steering Committee with the findings and recommendations from stakeholder consultations undertaken by PricewaterhouseCoopers.

Alberta Registries requested an audit of their Motor Vehicles Registry by both Alberta's Privacy Commissioner and the Auditor General. Their audit report identified some issues on how information is collected and shared, and it recommended a number of steps to protect the privacy of information in the Motor Vehicles Registry.

Alberta Registries engaged PricewaterhouseCoopers to undertake a consultation process to review five of the recommendations of the audit report. Alberta Registries proceeded with actions on the remaining 16 recommendations of the audit report.

PricewaterhouseCoopers consulted with Registry Agents and with users who regularly access information from the Motor Vehicles Registry. User workshops were held to understand the applications of the Motor Vehicles Registry information, the perceived impact of the recommendations, and user concerns with the recommendations. The users who participated in these workshops identified a number of potential scenarios that could result from the recommendations, and that could, in turn, impact the public. Following the user consultations, a number of focus groups were held in various locations in Alberta with randomly chosen members of the public. These focus groups examined the public's reaction to the scenarios provided by the users, and explored public perception of acceptable and unacceptable disclosure of personal information. Upon completion of the public focus groups, Angus Reid Group conducted a telephone survey of 800 Albertans.

PricewaterhouseCoopers also conducted a financial impact assessment of the audit recommendations on Registry Agents. Questionnaires were sent to all Registry Agents, with 65% of the Registry Agents responding to the survey. Results from the user workshops, public focus groups, Angus Reid's telephone surveys, and the Registry Agents' financial impact assessment were summarized and analyzed. Findings were presented to the Honorable Iris Evans - Minister of Municipal Affairs, the Privacy Commissioner, members of the Alberta Auditor General staff, representatives of the Ministry of Transportation and Utilities, and members of the All-party Committee.

Key findings from the consultations with the Registry Agents and the users included:

- user groups indicated that consumers would be adversely affected by the recommendations due to increased costs and complexity for businesses to provide services;
- user groups indicated that their businesses would be adversely affected by the recommendations due to the increased costs and complexity to provide services;
- users indicated that the justice system would be overloaded with requests for court orders;



The purpose of the study is to provide the members of the Public Health Commission with the information and recommendations necessary to develop a public health system for the Province of Ontario.

Alberta has been successful in many of its health programs, particularly in the areas of public health, health services, and health care. This success is due to a number of factors, including a strong commitment to public health, a strong commitment to health services, and a strong commitment to health care.

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The Public Health Commission is a body established by the Government of Alberta to provide advice and recommendations on public health matters. The Commission is composed of members from the public, private, and academic sectors. The Commission's mandate is to provide advice and recommendations on public health matters, including the development of public health programs, the provision of public health services, and the promotion of public health.

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Key findings from the consultation with the Public Health Commission and the members of the Public Health Commission are as follows:

1. The Public Health Commission is a body established by the Government of Alberta to provide advice and recommendations on public health matters. The Commission is composed of members from the public, private, and academic sectors. The Commission's mandate is to provide advice and recommendations on public health matters, including the development of public health programs, the provision of public health services, and the promotion of public health.
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- users perceive that the recommendations discriminate against private companies; and
- Registry Agents indicated that they would incur additional costs related to training and system requirements.

The key findings from the financial impact assessment included:

- 74% of the responding Registry Agents estimated their total loss in revenue would be less than \$1000; and
- 26% of the responding Registry Agents estimated their total revenue loss would range from \$1000 to \$45,000.
- responding Registry Agents would incur approximately \$1000 in additional expenses to upgrade safes, locks, filing and storage facilities. Additionally, transaction-processing costs would increase by approximately \$0.50 per transaction to comply with filing and administration requirements. It should be noted that there was a wide range in the cost information supplied by respondents, consequently the financial analysis section of this report should be referenced for further information regarding additional expenses that Registry Agents would incur.

The key findings from the public consultation included:

- the public indicated that disclosure of information in the Motor Vehicles Registry is acceptable when a legal right has been violated and the violator's information is requested; and
- the public indicated that access to information is unacceptable when it is related to financial or medical information (note that Alberta Registries does not collect financial information).

Throughout the consultation process, users, Registry Agents, and the public (stakeholders) indicated to PricewaterhouseCoopers that the final recommendations should:

- strike an appropriate balance – stakeholders indicated that, although protection of privacy is important, in some circumstances access to information is desired;
- include standards – stakeholders indicated that Alberta Registries should develop and implement clear and practical standards and procedures in terms of access to information; and
- consider the costs of implementing – stakeholders indicated that costs to users, consumers, Registry Agents and Alberta Registries will result from the implementation of the recommendations.

Following are the five audit recommendations and PricewaterhouseCoopers' recommendations as a result of the stakeholder consultation process:





## Audit Recommendations

Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
<p>"1 In order to protect the personal information of Albertans from inappropriate disclosure and consequent misuse, it is recommended that the Minister responsible for Alberta Registries consider the advisability of making personal information in the Office of the Registrar of Motor Vehicles Services fully subject to Part 2 of the Freedom of Information and Protection of Privacy Act.</p> <p>Alternatively, it is recommended that Alberta Registries consider adopting fair information practices that are equivalent to the Freedom of Information and Protection of Privacy Act with respect to the use, disclosure and protection of personal information in the Motor Vehicles Registry. (Recommendation #7 provides more detail.)"</p>	<p>See PricewaterhouseCoopers' recommendation #1 (below)</p>
<p>"7 While we recognize that the use and disclosure of personal information in the Office of the Registrar of Motor Vehicles is not subject to the Freedom of Information and Protection of Privacy Act, we believe that Albertans expect that the protection of privacy provisions should apply to the use and disclosure of registry information.</p> <p>It is recommended that Alberta Registries adopt fair information practices and disclose personal information only:</p> <ul style="list-style-type: none"> <li>• if the disclosure is consistent with the original purpose for which the information was collected; or</li> <li>• if there is legislative authority for disclosure; or</li> <li>• if informed consent has been obtained; or</li> </ul>	<p>1. It is recommended that if a legal remedy is being pursued with respect to either civil legal proceedings or civil enforcement (Civil Enforcement Act), access to Motor Vehicle information be allowed.</p> <p>Examples of acceptable access to information under pursuit of legal remedy include:</p> <ul style="list-style-type: none"> <li>• access to name, address and physical description of debtors by sheriffs, bailiffs and civil enforcement agencies in order to locate debtors and to assist in investigations ;</li> <li>• access to address identification/confirmation by lawyers trying to find addresses to serve court documents (lawyers must have a case pending in order to access this information);</li> </ul>



Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
<ul style="list-style-type: none"> <li>• if disclosure is for a purpose consistent with the provisions of sections 38, 40 and 41 of the Freedom of Information and Protection of Privacy Act, which specifies the circumstances under which a public body may disclose personal information."</li> </ul>	<ul style="list-style-type: none"> <li>• access to names and addresses of writers of cheques with insufficient funds when a driver's licence number has been provided as identification or implied consent;</li> <li>• access to names, addresses and physical descriptions of individuals by private investigators (PI's) subcontracted by a lawyer or an insurance company, or where a case is being investigated. PI's must provide proof of 'legitimacy' prior to obtaining any information. In addition, PI's should be: <ul style="list-style-type: none"> <li>➤ licenced and bonded,</li> <li>➤ employed by a registered agency, with proof of general liability insurance in a minimum amount of \$1 million, and</li> <li>➤ registered as a member of the Alberta Association of Private Investigators, and thereby be subject to its Code of Ethics; and</li> </ul> </li> <li>• access to name and address information by private parking companies should be continued under certain conditions. These conditions include: <ul style="list-style-type: none"> <li>➤ large signs must be displayed by the ticket dispenser informing the consumer of the parking lot requirements,</li> <li>➤ a phone number for consumer complaints must be provided on the signs. This phone number should be monitored by the parking company,</li> <li>➤ the signs must indicate that the parking company may use licence plate information to</li> </ul> </li> </ul>





Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
	<p data-bbox="864 345 1164 458">           send notices of violation to illegally parked vehicles, and            ➤ the proof of violation rests with the parking company.         </p> <p data-bbox="712 491 1164 874">           2. It is recommended that electronic batch interfaces should be used in place of direct access to the Motor Vehicles Registry to prevent browsing. However, users who require information immediately in order to make decisions regarding the arrest or detainment of individuals or regarding the immediate impounding of vehicles (ie. University campus security officers), should continue to have direct access. Direct access for parking control purposes should be disallowed.         </p> <p data-bbox="712 906 1164 1444">           3. It is recommended that Alberta Registries implement a clear and practical compliance model detailing access provisions. It is our understanding that Alberta Registries has developed such a model, with the necessary computer enhancements in progress. This model should delineate the standards by which access to the Motor Vehicles Registry is allowed, and should address the circumstances described above. An audit function must be identified to ensure that users of the Motor Vehicles Registry information are abiding by their access agreement. Consequences of abuse must be clear, and should include revocation of Motor Vehicles Registry access.         </p> <p data-bbox="712 1476 1164 1641">           4. It is recommended that Alberta Registries consider establishing an independent body to periodically review access standards and to provide an objective mechanism for appeal when an application for access is denied.         </p>





Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
	<p>5. It is recommended that adoption search agencies continue to receive name and address information from the Motor Vehicle Registry. These agencies have protection of privacy tools in place, and should receive special consideration.</p>
<p>"8 It is recommended that Alberta Registries monitor the disclosure of driver abstracts to ensure consent is obtained in compliance with the Motor Vehicles Registry legislation."</p>	<p>6. Alberta Registries should proceed with the Auditor General's and Privacy Commissioner's recommendation 8. Although the insurance companies indicated that the general public would be negatively impacted by the requirement to obtain informed consent from all members of a household, the public indicated a desire to provide informed consent with regard to insurance company access to their driver abstracts. As the legislation is currently in place to address this issue (MVAA, Section 66), it is recommended that Alberta Registries proceed with the implementation of recommendation 8.</p>
<p>"9. It is recommended that Alberta Registries ensure that the personal information disclosed to clients is used in accordance with the terms of the access agreements between Alberta Registries and those clients."</p>	<p>7. Our stakeholder consultations did not reveal significant concerns with this recommendation. Alberta Registries should proceed with the Auditor General's and Privacy Commissioner's recommendation 9 in conjunction with the compliance model and the terms indicated above.</p>
<p>"10. In order to ensure that access to the Motor Vehicles Registry is restricted uniformly, it is recommended that Alberta Registries establish standards and conditions for granting access privileges, and regularly update its records."</p>	<p>8. Both public and user stakeholders were supportive of the Auditor General's and Privacy Commissioner's recommendation 10. Alberta Registries should proceed with recommendation 10 in conjunction with the compliance model and the terms indicated above.</p>



## Project Information

### Background

Alberta Registries has a responsibility to collect and retain information in the Motor Vehicles Registry. To address this responsibility, Alberta Registries requested an audit by both Alberta's Privacy Commissioner and the Auditor General. Their report identified some issues on how information is collected and shared. It recommends a number of steps to protect the privacy of information in the Motor Vehicles Registry.

In April 1998, Alberta Registries engaged PricewaterhouseCoopers to undertake a consultation process with Registry Agents and with other organizations that regularly access and use information from the Motor Vehicles Registry. Based on the results of the consultation, new policies and standards will be developed. In general, results of the audit of the Motor Vehicles Registry were released on April 22, 1998, by the Honorable Iris Evans - Minister of Municipal Affairs. The audit identified 21 recommendations. Alberta Registries proceeded immediately with actions on 16 recommendations, which address management controls and information systems.

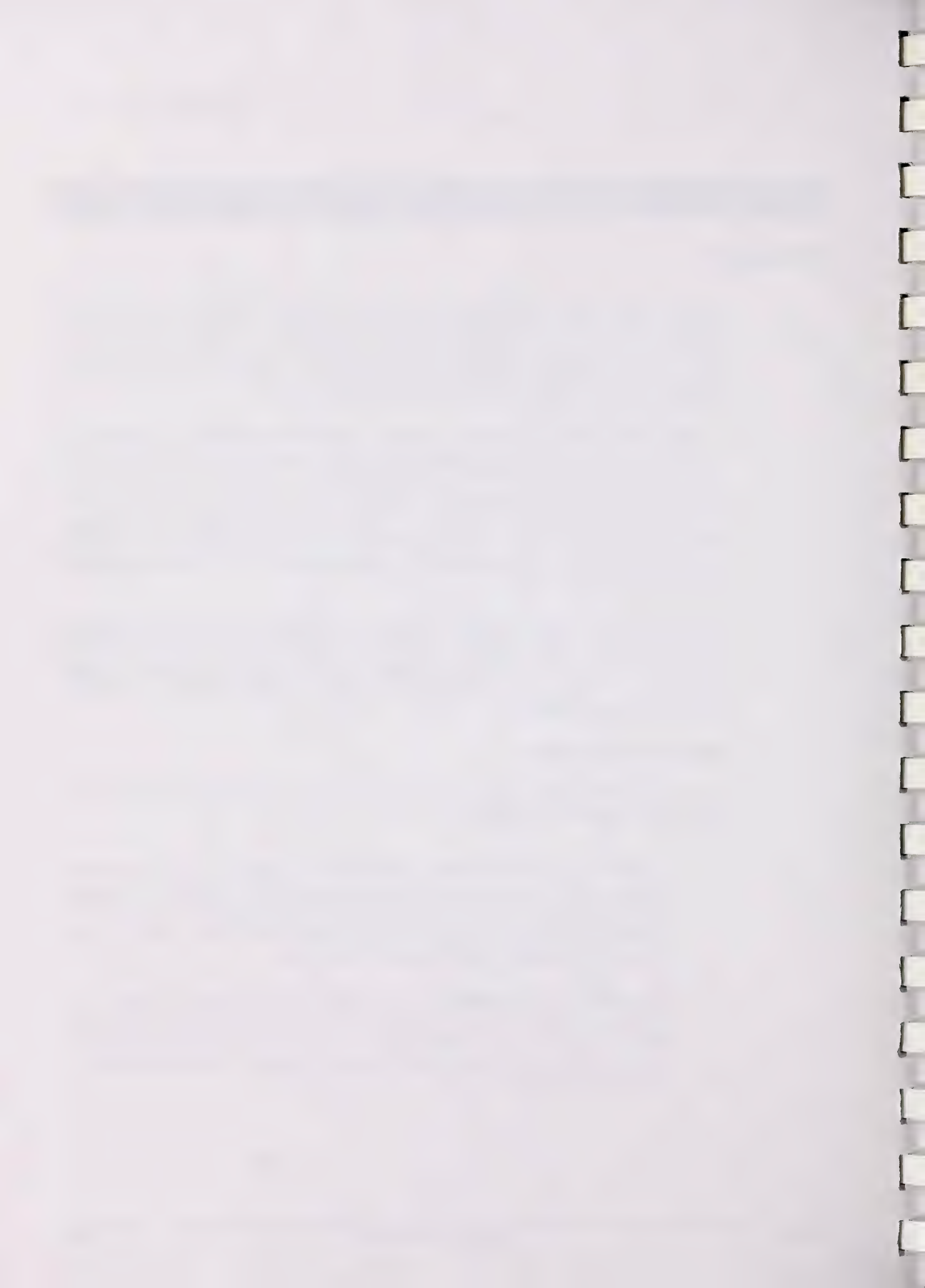
We understand that Alberta Registries agrees in principle with the recommendations. However, five of the recommendations – those dealing specifically with protection of privacy of information in the Motor Vehicles Registry – involve complex, contractual business arrangements. These five recommendations which required additional stakeholder consultation are presented below.

### Audit Recommendations

The following five recommendations were the focus of the consultations with information users, Registry Agents and the public:

- "1 In order to protect the personal information of Albertans from inappropriate disclosure and consequent misuse, it is recommended that the Minister responsible for Alberta Registries consider the advisability of making personal information in the Office of the Registrar of Motor Vehicles Services fully subject to Part 2 of the Freedom of Information and Protection of Privacy Act.

Alternatively, it is recommended that Alberta Registries consider adopting fair information practices that are equivalent to the Freedom of Information and Protection of Privacy Act with respect to the use, disclosure and protection of personal information in the Motor Vehicles Registry. (Recommendation #7 provides more detail.)"





- "7 While we recognize that the use and disclosure of personal information in the Office of the Registrar of Motor Vehicles is not subject to the Freedom of Information and Protection of Privacy Act, we believe that Albertans expect that the protection of privacy provisions should apply to the use and disclosure of registry information.

It is recommended that Alberta Registries adopt fair information practices and disclose personal information only:

- if the disclosure is consistent with the original purpose for which the information was collected; or
- if there is legislative authority for disclosure; or
- if informed consent has been obtained; or
- if disclosure is for a purpose consistent with the provisions of sections 38, 40 and 41 of the Freedom of Information and Protection of Privacy Act, which specifies the circumstances under which a public body may disclose personal information."

- "8 It is recommended that Alberta Registries monitor the disclosure of driver abstracts to ensure consent is obtained in compliance with the Motor Vehicles Registry legislation."

- "9. It is recommended that Alberta Registries ensure that the personal information disclosed to clients is used in accordance with the terms of the access agreements between Alberta Registries and those clients."

- "10. In order to ensure that access to the Motor Vehicles Registry is restricted uniformly, it is recommended that Alberta Registries establish standards and conditions for granting access privileges and regularly update its records."



## Terms of Reference

Alberta Registries engaged PricewaterhouseCoopers to undertake a consultation process with Registry Agents and with other organizations that regularly access and use information from the Motor Vehicles Registry. The terms of reference for this assignment were to:

- develop a thorough understanding of the policies governing Alberta Registries and third-party service providers;
- develop a thorough understanding of users of Alberta Motor Vehicles Registry information;
- review relevant background material, including the privacy compliance audit report, to gain a thorough understanding of the privacy issues;
- contact key stakeholders to participate in workshops designed to assess the impact of the recommendations on their businesses;
- provide workshop participants with pre-reading material;
- review the financial impact of the recommendations on the Registry Agents;
- develop and conduct focus group sessions to understand public concerns with the use and disclosure of Motor Vehicles Registry information; and
- develop recommendations pertaining to the use and disclosure of Motor Vehicles Registry information.

## Project Methodology

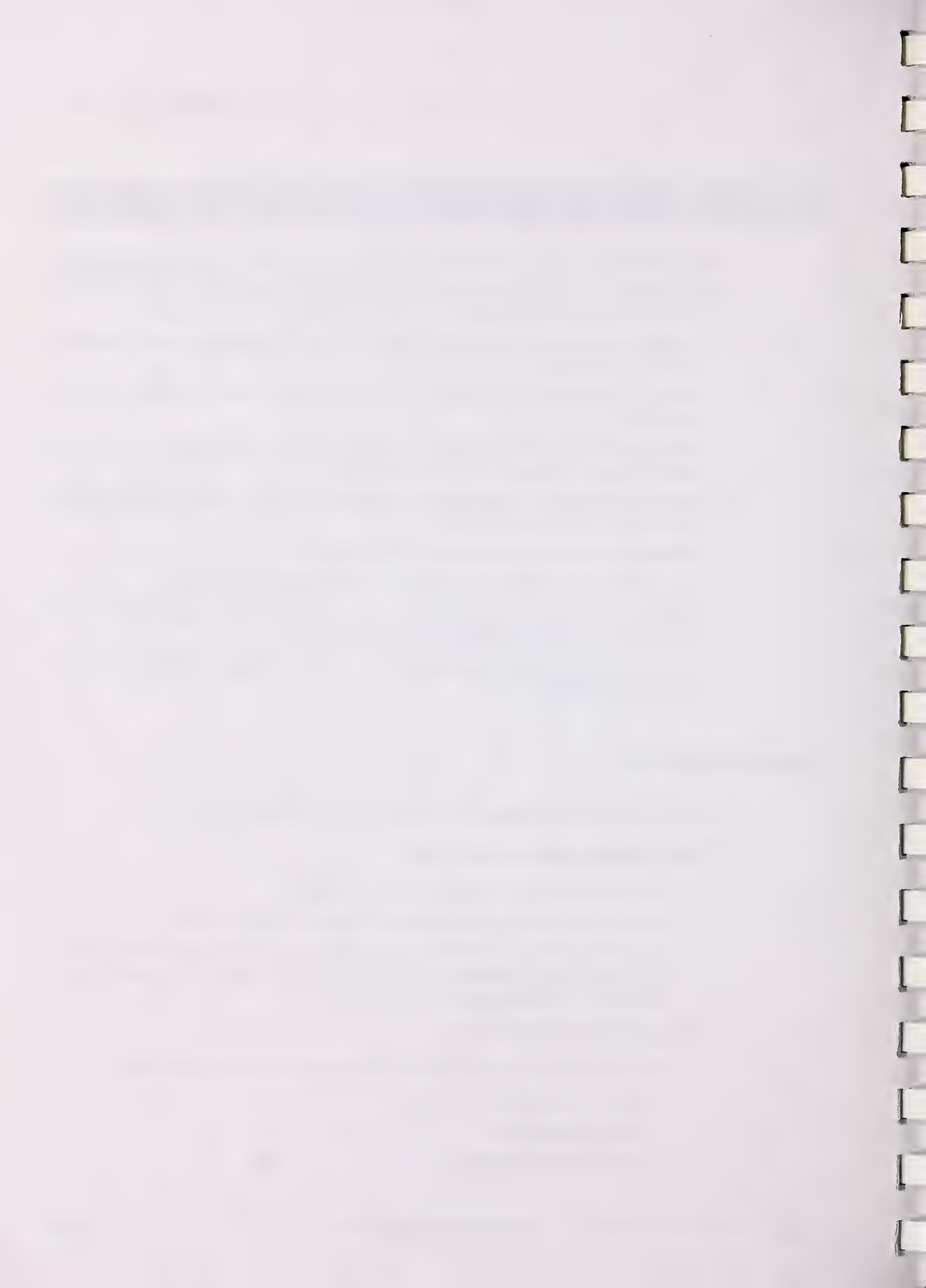
We adopted the following approach to the stakeholder consultation project:

### 1. Data gathering and development stage

- Selected user groups to be invited to the consultations.
- Prepared an assessment of the anticipated impact on each user group.
- Prepared a discussion workbook and questionnaire to inform participants of the anticipated change in advance of the workshop, and to provide participants with a vehicle for a written response (see Appendix A).

### 2. Stakeholder consultation stage

- Conducted 12 sessions with users of the Motor Vehicles Registry, including:
  - insurance companies and brokers;
  - private investigators;
  - private parking companies;

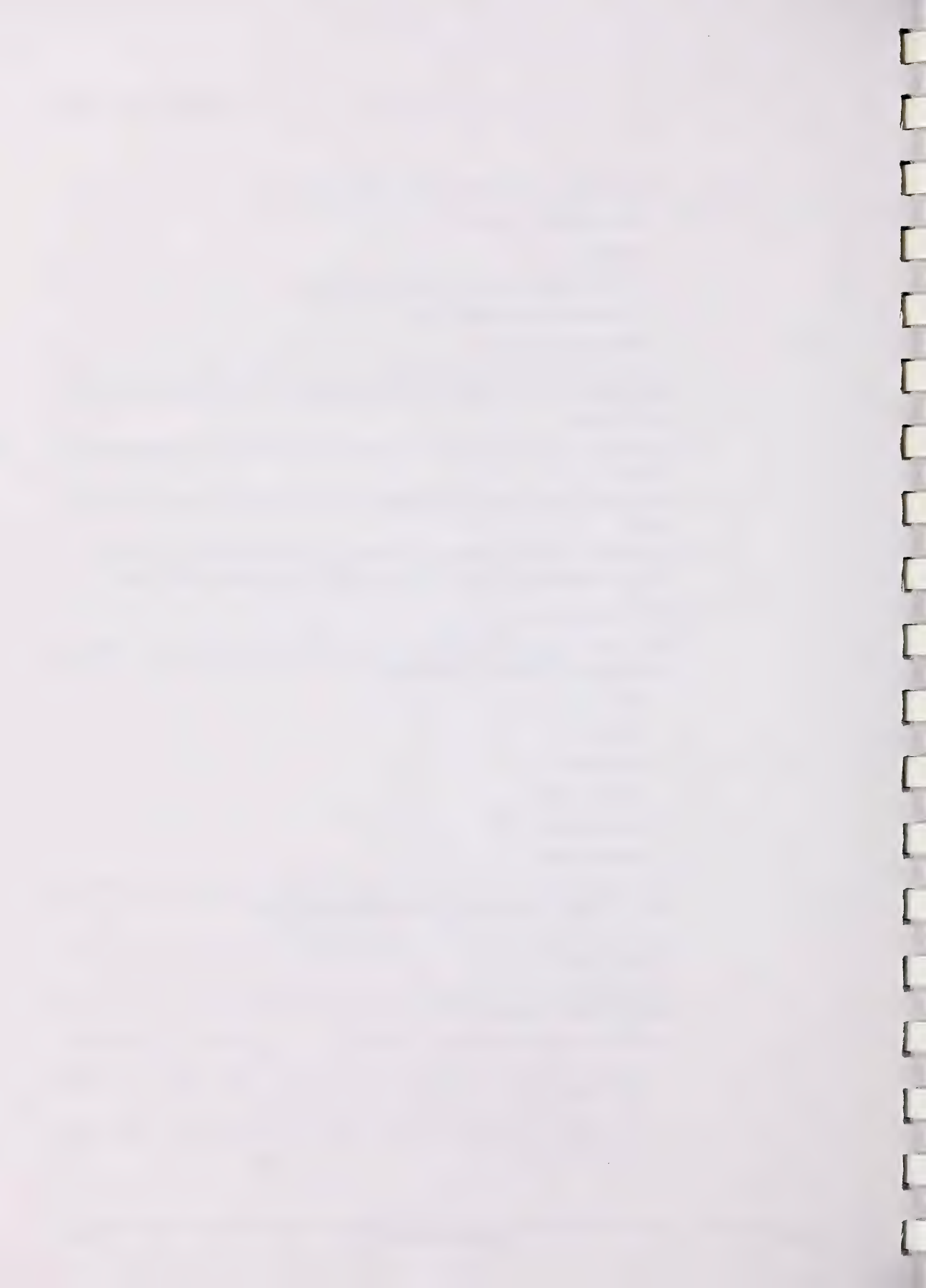




- other parking authorities (i.e. University of Alberta);
  - adoption search agencies;
  - lawyers;
  - legal enforcement and debt collection agencies;
  - corporate security agencies; and
  - financial institutions.
- Asked users to attend a two-hour session, which highlighted the recommendations, and asked them to comment on the perceived impact of the recommendations on their business.
  - Provided users, who were not able to attend the workshops, with a questionnaire to complete.
  - Identified common themes and concerns with the recommendations within each user group.
  - Consulted with Registry Agents, as providers of this information to user groups, to identify the high level impact of the recommendations on their search business.

### **3. Public research stage**

- Developed focus group sessions for randomly selected participants in the following six geographical locations within Alberta:
  - Red Deer,
  - Calgary,
  - Lethbridge,
  - Grande Prairie,
  - Edmonton, and
  - Sherwood Park.
- Recruited participants with the assistance of PricewaterhouseCoopers' National Survey Centre in Ottawa, using local telephone directories.
- Conducted sessions using actual scenarios provided by the users of the Motor Vehicles Registry.
- Asked participants to identify situations where disclosure of personal information was acceptable or unacceptable.
- Provided situations to participants for discussion (see Appendix B), which included:
  - private investigators accessing name, address and personal descriptive information in order to assist in insurance investigations,
  - lawyers accessing name and address information in order to find individuals to serve court documents,



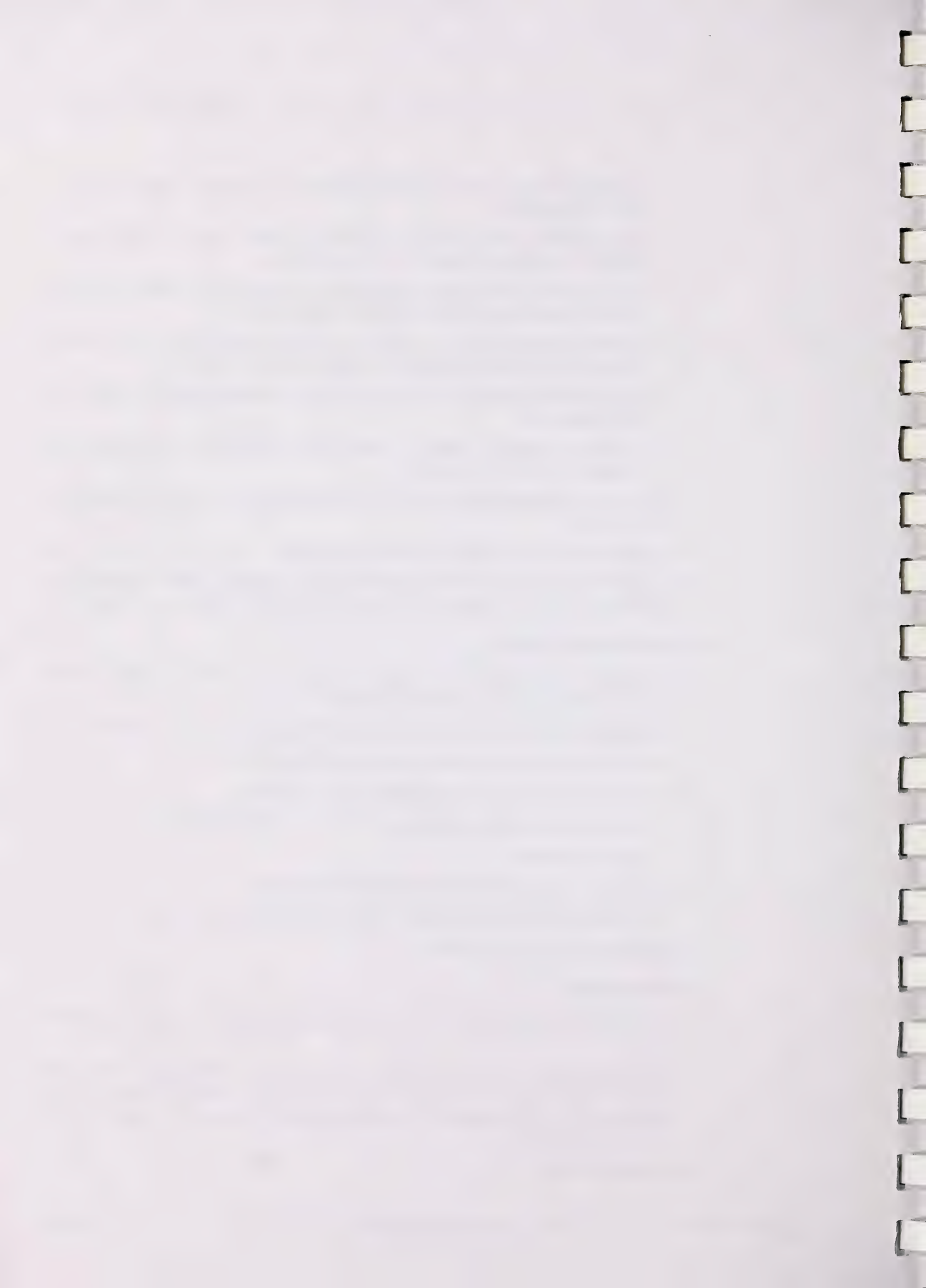
- lawyers accessing vehicle ownership information in order to determine assets in divorce proceedings,
  - private parking companies receiving name and address information from licence plates on illegally parked vehicles on the parking lot,
  - private parking companies turning name and address information to a debt collection company in order to collect on unpaid fines,
  - private corporate security personnel accessing employees motor vehicle ownership information in order to investigate fraudulent behaviour,
  - debt collection companies using drivers licence numbers provided on cheques to find debtors, and
  - insurance companies requesting signed consent forms from all members in a household for insurance purposes.
- Met with representatives from the Consumers Association of Canada to brief them on the process.
  - Compiled and analyzed results from the focus groups.
  - Assisted in the development of a telephone survey using the qualitative results from the focus groups. The telephone survey was undertaken by Angus Reid Group.

#### **4. Financial analysis stage**

- Developed a questionnaire for Registry Agents to determine the impact of the recommendations on their business (see Appendix C).
- Reviewed the questionnaire with the president of the Registry Agents Association.
- Assisted Registry Agents in the completion of the questionnaire.
- Requested information from the Registry Agents including:
  - number of searches processed from the Motor Vehicles Registry,
  - type of customers,
  - perceived dollar impact of the recommendations, and
  - perceived impact of a non-financial nature of the recommendations.
- Analyzed the results of the input.

#### **5. Reporting stage**

- Gathered and analyzed data from user consultations, financial analysis and public research.
- Presented findings to the Honorable Iris Evans – Minister of Municipal Affairs, the Privacy Commissioner, members of the Alberta Auditor General staff, representatives of the Ministry of Transportation and Utilities, and members of the All-party Committee.
- Prepared a report.





## **6. Follow-up stage**

- Alberta Registries has developed public information material to be distributed to the Registry Agent offices when the standards are finalized. User group meetings will also be conducted to share new standards with these stakeholders.
- Alberta Registries has developed a clear and practical compliance model. Implementation of this model will follow once new standards are finalized.



## Stakeholder Consultation

### Registry Agents and Other Users

#### Objectives

The objectives of the consultation with external users were to:

- discuss the implications of the five recommendations on the participants' business/organization;
- identify issues and concerns with the recommendations;
- discuss current and anticipated standards and anticipated changes; and
- discuss briefly the remaining 16 recommendations with the Registry Agents.

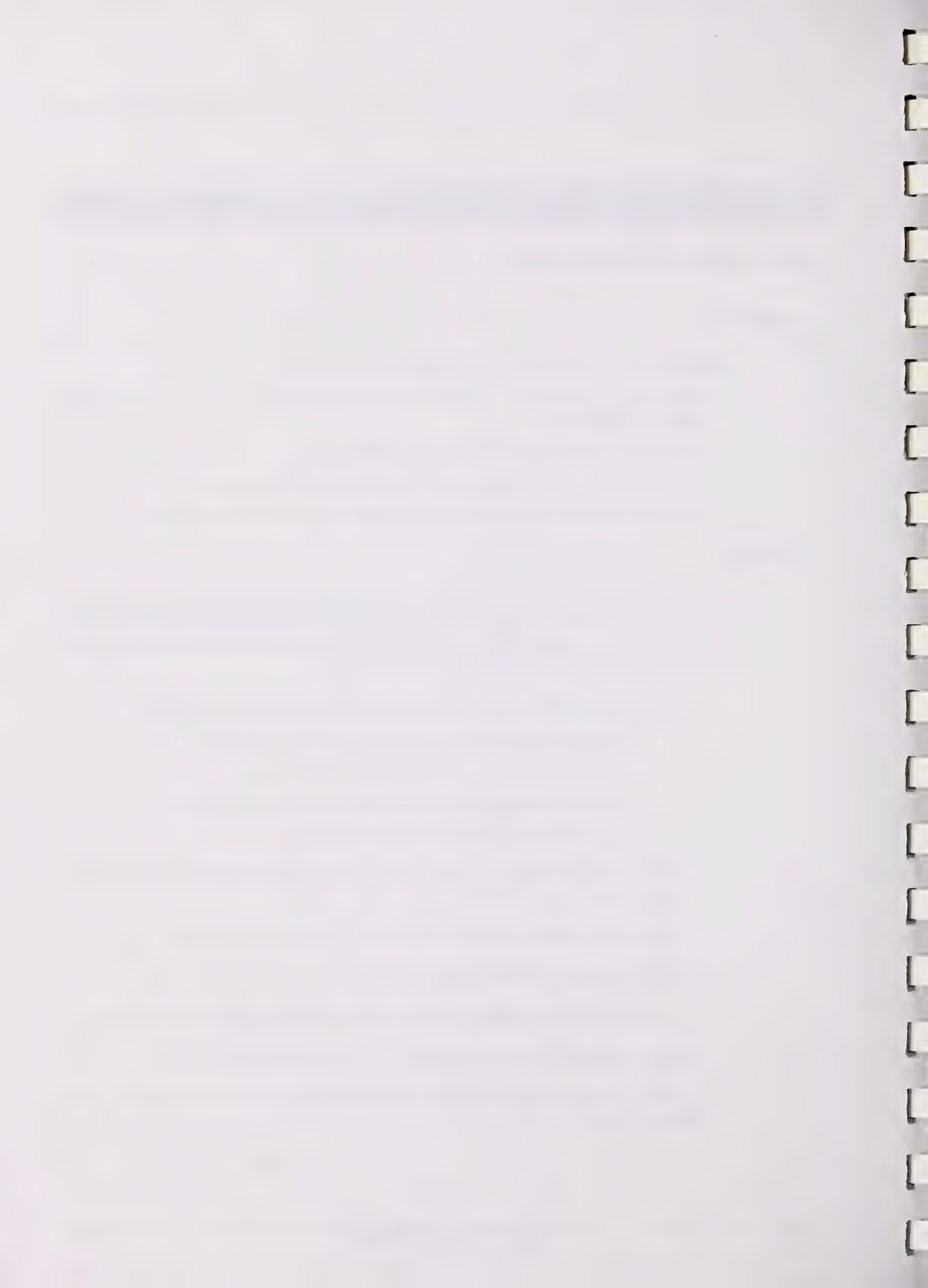
#### Findings

The sessions helped Alberta Registries and PricewaterhouseCoopers to better understand how the Motor Vehicles Registry is used, and allowed users and Registry Agents to express their views on the recommendations. A number of common themes and concerns emerged from the user and Registry Agent consultations including:

1. The public would be adversely affected by the recommendations through:
    - increased time required to provide consumers with service;
    - increased costs to provide consumers with services;
    - fewer services available to the public for a reasonable cost; and
    - increased protection of dishonest individuals.
  2. Users would be adversely affected by the recommendations through increased time and complexity to do business.
  3. The justice system would be overloaded with requests for court orders.
  4. Registry Agents would incur additional costs.
  5. Users perceive that the recommendations discriminate against private companies.
- 1. The public would be adversely affected by the recommendations**

All users perceived a negative impact to consumers due to the recommendations. These impacts included:





- **Increased time required to provide consumers with service.** This included applying for insurance, locating debtors, and processing loans. Insurance companies indicated that they would have to delay processing insurance applications until all relevant driver abstracts have been obtained. Debt collection companies and civil enforcement representatives indicated that the time required to track down debtors would increase substantially, as they would have no convenient method to find the debtor.
- **Increased costs to provide consumers with services.** Users indicated that fees for parking, legal services, debt collection, insurance, loan processing, and adoption search services would increase. Users indicated that many forms would require informed consent clauses; the cost of revising these forms would be passed onto the consumer. Debt collection agencies and lawyers indicated that it would not be cost effective for many businesses to pursue the collection of small debt. The threshold for pursuing debt collection would increase significantly.
- **Fewer services available to the public for a reasonable cost.** Private parking companies indicated that parking fees would increase due to lost revenue. They also expressed concern that a number of landlords would revoke the use of their property for parking purposes if vehicles were towed rather than ticketed.

Adoption search agencies and lawyers indicated that their fees would increase. They also expressed concern that some people would not be able to afford their services.

Currently, the Motor Vehicles Registry is the least intrusive means available to find parents, children and siblings of adoption. Lawyers indicated that additional time would be required to search for individuals to serve papers, resulting in an increase in legal fees.

- **Increased protection of dishonest individuals.** Users indicated that even debtors and dishonest individuals regularly update their Motor Vehicles Registry information. Thus, the Motor Vehicles Registry is an effective tool to find individuals. To illustrate, private investigators use information in the Motor Vehicles Registry to successfully resolve files. Private investigators also indicated that approximately 62% of their files are related to insurance fraud. The insurance industry estimates that insurance fraud in Canada is approximately \$1-2 billion per year. Private investigators and insurance companies indicated that restricted access to the Motor Vehicles Registry would result in fewer successful investigations.

## **2. Users would be adversely affected by the recommendations**

Three of the user groups indicated that they could be forced out of business if the recommendations were adopted. The remaining user groups indicated that their businesses would be negatively impacted from a financial perspective. Representatives for private investigators, debt collection agents, and adoption search agencies indicated that information from the Motor Vehicles Registry allows them to conduct business in a discreet manner. Further, private investigators and debt collection companies argue that obtaining informed consent from most individuals is unrealistic.



Some users, including lawyers, use the personal information from the Motor Vehicles Registry prior to initiating civil/criminal action. Insurance representatives indicated that the recommendations would require them to increase their administrative time on each file, and would delay the processing of insurance applications. Representatives from private parking companies felt that the recommendations would result in fewer landowners subletting their land for parking purposes, which in turn would affect the consumer due to fewer available parking spaces. One parking company indicated that they could lose up to \$2-3 million dollars in parking revenue, and the government would lose up to \$500,000 from parking search requests.

**3. The justice system would be overloaded with additional requests for court orders**

Users expressed concern that the justice system would be inundated with court order requests to allow them access to personal information maintained in the Motor Vehicles Registry. It was suggested that the number of requests would backlog the justice system. In addition, users felt that the courts may not be aware of the type of information that is required on a case-by-case basis, and that extraneous information may be included in the court order which could be perceived as a further invasion of privacy.

**4. Registry Agents would incur additional costs**

Registry Agents were concerned that they would be liable if Motor Vehicles Registry information was inappropriately disclosed. Registry Agents indicated that staff would require additional training to interpret court orders and to ensure that the party requesting the search has authorization to receive the resulting information. Registry Agents indicated that the time to process requests would increase, as would the potential for staff bribery.

Although not directly part of our scope, Registry Agents noted concerns about the 16 recommendations pertaining to management controls and information systems included in the audit report. They were particularly concerned about unique system identifications and office security. Most Registry Agents indicated that using unique passwords for each employee would be unrealistic due to the time required to log on to the Motor Vehicles Registry system (MOVES). As well, Registry Agents suggested that their office security decisions were business decisions, and that the recommendations did not take into consideration offices with multiple businesses. Registry Agents were provided with an opportunity to comment on all of the recommendations in the financial impact analysis. The details of this analysis are included on page 19-26 of this report.

**5. Users perceive that the recommendations discriminate against private companies**

The Freedom of Information and Protection of Privacy Act (FOIP) allows public bodies to utilize the Motor Vehicles Registry for enforcing legal rights (Section 38(1h)). In 1996, the Government of Alberta privatized the sheriff's department. Bailiffs indicated that if access to the Motor Vehicles Registry is denied, they would not be able to complete their jobs. Bailiffs indicated that public enforcement agencies continue to have access to the Motor Vehicles Registry.





In addition, representatives from private parking companies feel that the audit recommendations give a distinct business advantage to public parking authorities, resulting in “distinction without a difference” because public authorities will continue to have access to the Motor Vehicles Registry.

## **Public Research**

The Public Research component of this project consisted of two stages, including:

- public focus groups (conducted by PricewaterhouseCoopers); and
- public telephone surveys (conducted by Angus Reid Group).

## **Objectives**

The objectives of the public research were to:

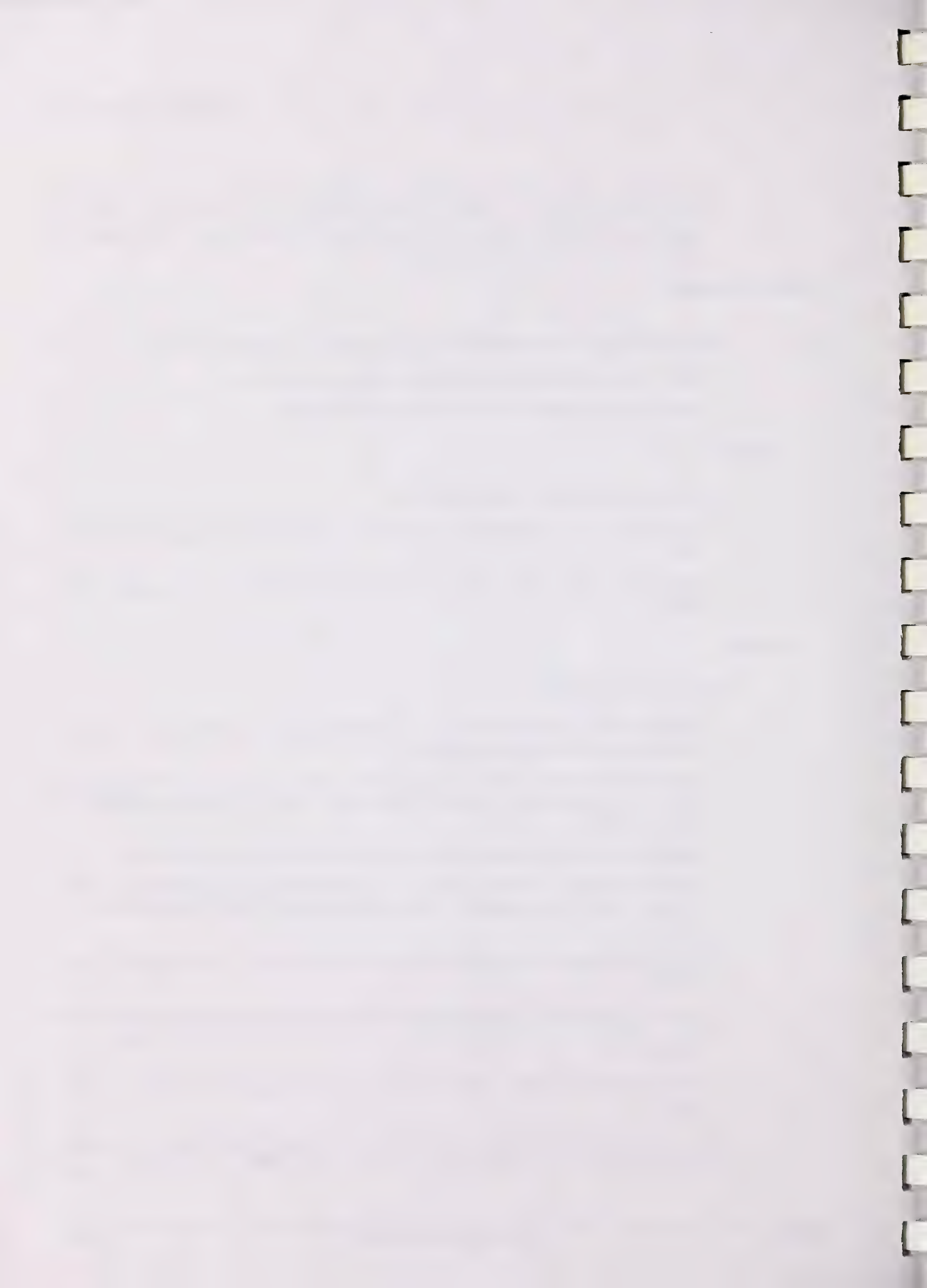
- identify situations where disclosure of personal information is acceptable to the public; and
- identify situations where disclosure of personal information is unacceptable to the public.

## **Findings**

Participants indicated that:

- individuals who use their driver’s licence as identification are providing implied consent for access to their personal information;
- unbiased third parties may have access to names, addresses and physical descriptions if there is a legitimate purpose behind the request for access, for example, investigation of insurance fraud;
- individuals should not be able to access personal information of other individuals;
- private investigators providing services to legitimate clients (i.e., insurance companies, lawyers) should have access to names, addresses and physical descriptions when necessary;
- parking companies should have clear signage indicating the consequences of illegal parking;
- parking companies should have access to names and addresses of violators, however, the public indicated that standards need to be in place to ensure that information is not misused; and
- individuals should provide consent before insurance companies have access to driver abstracts.

Telephone surveys were conducted in October by the Angus Reid Group to understand public concerns with the use and disclosure of Motor Vehicles Registry information. Angus



Reid Group contacted 800 households to further examine the preliminary findings that emerged from the focus group sessions.

Public opinions and attitudes were surveyed with respect to:

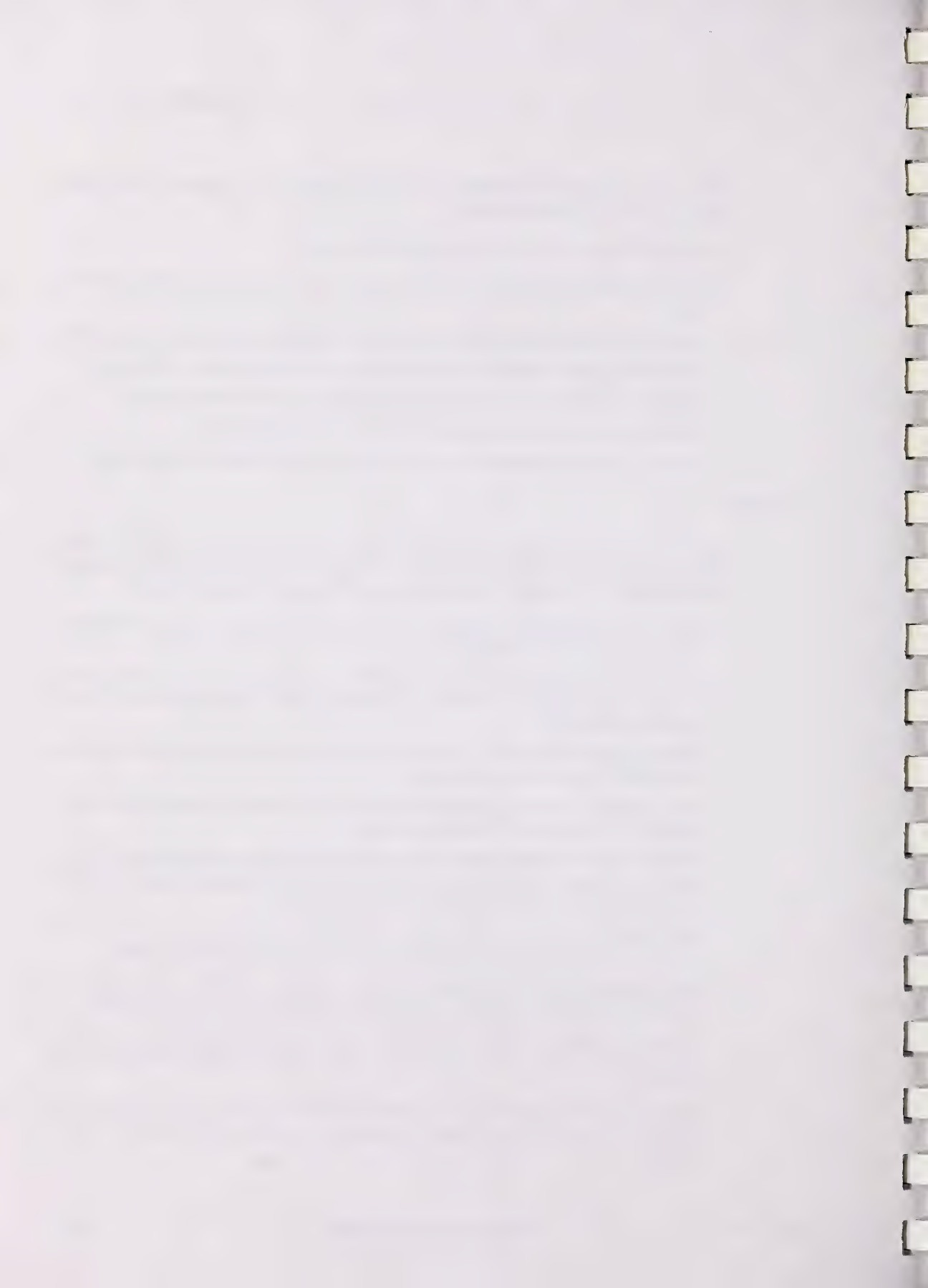
- parking companies accessing name and address information from the Motor Vehicles Registry;
- parking companies passing name and address information to debt collection companies;
- private investigators using Motor Vehicles Registry information during investigations;
- insurance companies accessing driver abstracts for all members of a household;
- lawyers accessing information from the Motor Vehicles Registry; and
- corporate security personnel accessing information from the Motor Vehicles Registry.

## **Findings**

Angus Reid Group has provided Alberta Registries with a formal report on their proceedings. PricewaterhouseCoopers was also provided a summary of these findings in order to assist us with our analysis. A summary of Angus Reid Group's findings is presented below:

- only 7% of Albertans feel very informed about who has access to personal information stored in the Motor Vehicles Registry;
- the majority of respondents contacted (58%) indicated support for private parking companies accessing name and address information to send reminder notices of violation to parking offenders;
- 71% of respondents indicated a preference for name and address disclosure over having their vehicle towed from the parking lot;
- most Albertans surveyed disagreed that parking lot companies should be able to pass personal information to a debt collection company;
- the majority of respondents agreed with the practice of lawyers using the Motor Vehicles Registry to request information on vehicle ownership, and to request address information in order to deliver court papers (60% and 68%, respectively);
- most Albertans surveyed (76%) feel that insurance companies should have written consent before accessing driver abstracts, even if this means increasing premiums;
- respondents are divided on whether informed consent for access to driver abstracts should be provided by the primary driver (54%) or all drivers in a household (45%);
- surveyed Albertans are divided on whether to allow private investigators the ability to request personal information in order to investigate insurance claims (49% agree, 51% disagree);
- support for access to information by private investigators is lowest when they are hired by an individual (9%), but is higher for insurance companies (60% agree) or lawyers (54%);





- most agree that private investigators should have to provide proof that they have been hired to conduct an investigation (93%);
- the majority of Albertans surveyed do not feel that employers should have access to personal information when investigating fraud (58%);
- however, half of the respondents indicated that access to motor vehicle ownership information is acceptable in the case of suspicious vehicles on private property;
- overall, the majority of respondents indicated that it is in the public interest to release personal information that can potentially stop fraud, but many (84%) are concerned that this information will be used for purposes other than for which it was originally requested;
- 66% of respondents disagreed with the statement that “only people with something to hide would be concerned about having their personal information released”; and
- 65% of respondents felt that lawyers will handle this information responsibly, compared to 45% of the respondents indicating that private investigators would handle the information responsibly.

In general, the results from the telephone survey support the findings from the public focus group sessions. The findings from both the focus groups and the telephone survey clearly indicate that informed consent is desired before insurance companies access driver abstracts. However, the focus group participants strongly indicated a preference for individual consent prior to insurance company access to driver abstracts, while the telephone respondents were divided on whether informed consent should be provided by the individual, or by the primary driver in a household.



## Financial Impact Assessment

### Objectives

The objectives of the financial impact assessment were to:

- determine the financial impact of the audit recommendations on Registry Agents; and
- provide a vehicle for Registry Agents to express their comments and concerns pertaining to the audit recommendations.

### Findings

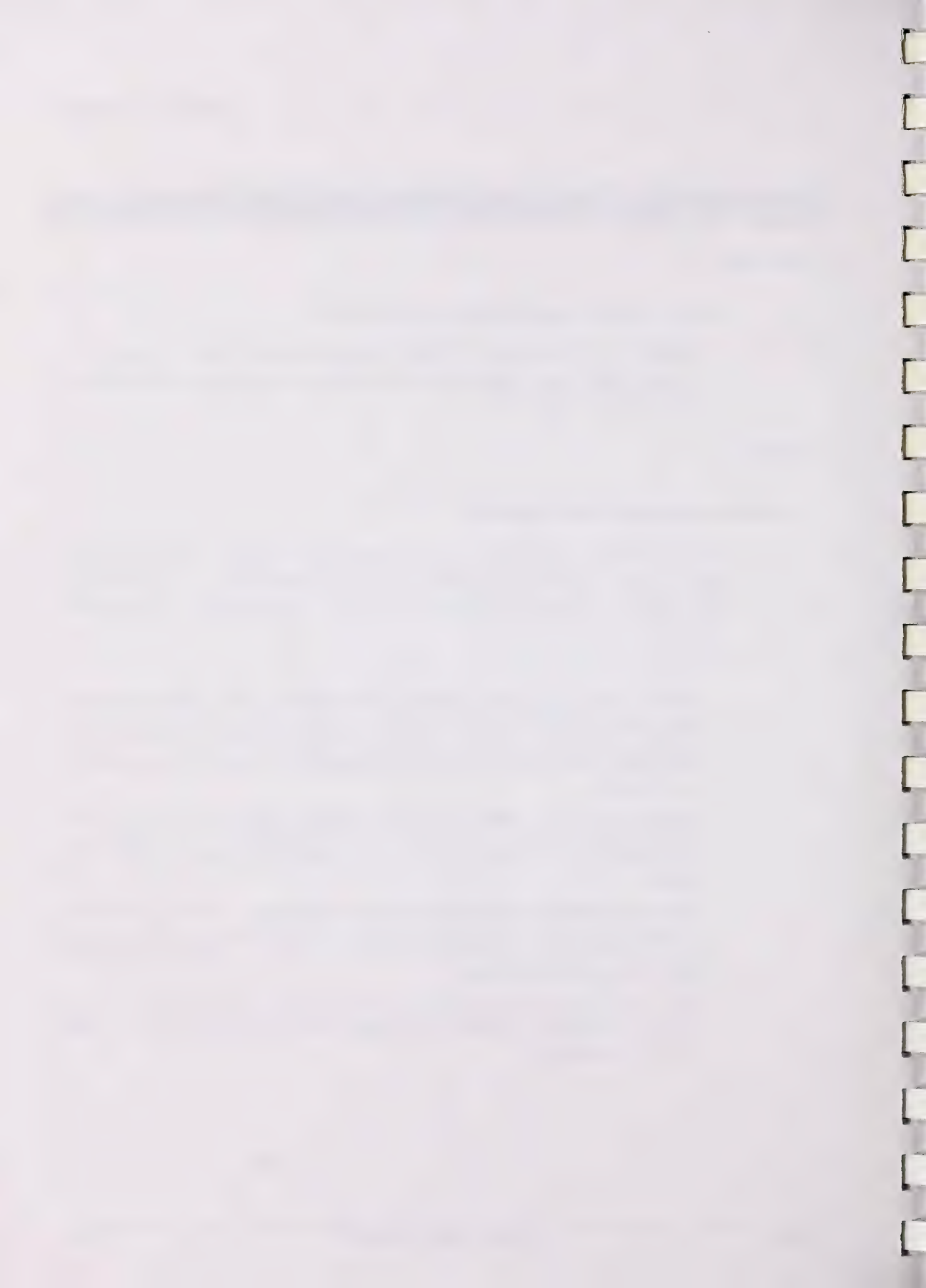
#### Financial Impact by Type of Service

The results of the financial impact assessment reflect only the data provided by the Registry Agent respondents, and their perceived impact of the recommendations. In most cases, the numbers provided below reflect the worst case scenario – where access by key stakeholders is removed.

##### Overview

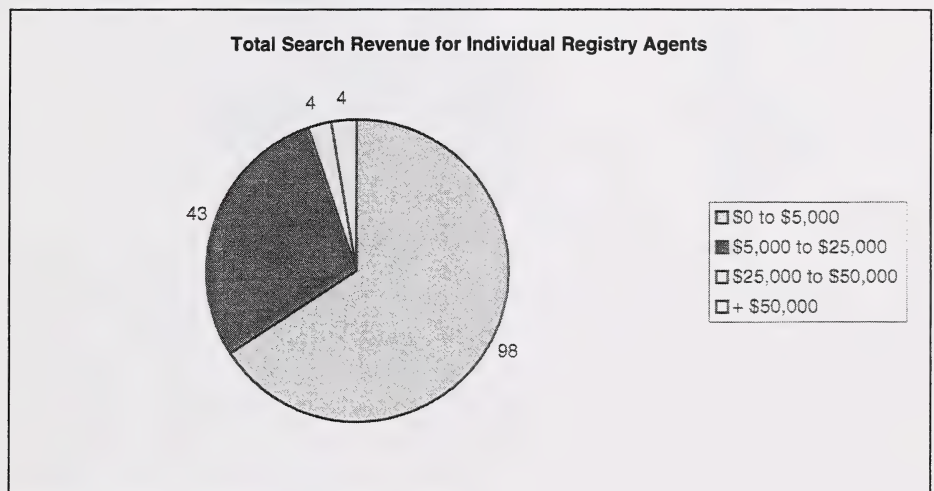
- The total annual net revenue obtained from searches by 148 survey respondents is approximately \$1 million. This calculation was based on the respondent's answer to question #6 (average service fee charged per search) and the number of searches performed by each respondent based on government Motor Vehicles Registry records for search requests.
- The range of revenue earned by individual Registry Agents for all types of Motor Vehicles Registry searches combined is from \$0 to \$200,000. The average search revenue earned is less than \$20,000 for urban agencies and less than \$5,000 for rural agencies.
- The survey respondents indicated that the new requirements would result in lower revenues of between \$0 and \$45,000 per agency. The total impact for all Registry Agent respondents is approximately \$250,000, which is equivalent to 25% of their total Motor Vehicles Registry search revenue.
- Many of the respondents indicated that they were less concerned with the loss of revenue than they were with the increased cost, complexity and administrative burden imposed by the new requirements.





## Analysis of Search Revenue

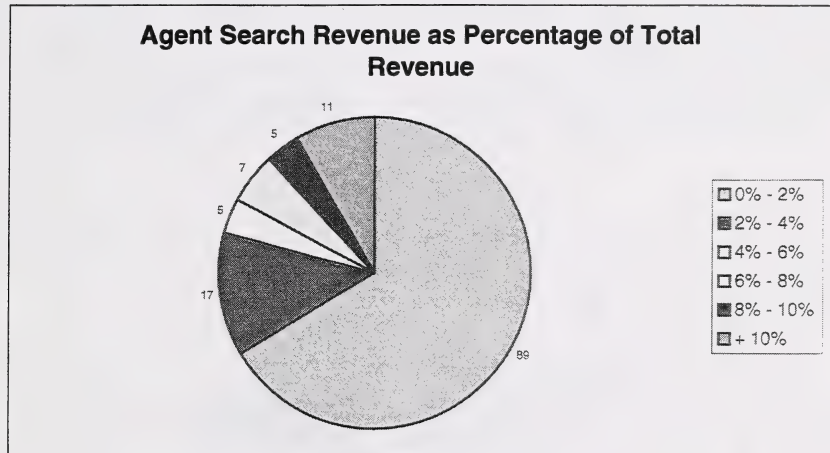
- In general, there is a significant difference between the average revenue calculations and the median revenue calculations for individual Registry Agents, with the median always lower than the average. This is caused by the fact that a large group of survey respondents earned little or no search revenue, and a small group of urban Registry Agents earn proportionately higher revenue. Below is a chart categorizing the number of respondents according to their search revenue:



- There are eight individual respondents with more than \$25,000 in search revenue. For these eight agents, search revenue comprises less than 10% of their total revenue. Three of the eight respondents indicated they would lose 0% of their search revenue as a result of the recommendations, three indicated they would lose between 1% and 50%, and two indicated they would lose more than 50%. In total, the eight agents estimated they would lose approximately \$100,000 in revenue.



- In general, search revenue is only a small portion of total revenue for most agents. Below is a chart categorizing agent search revenue as a percentage of their total revenue based on responses to question #2 in the Financial Impact Questionnaire:

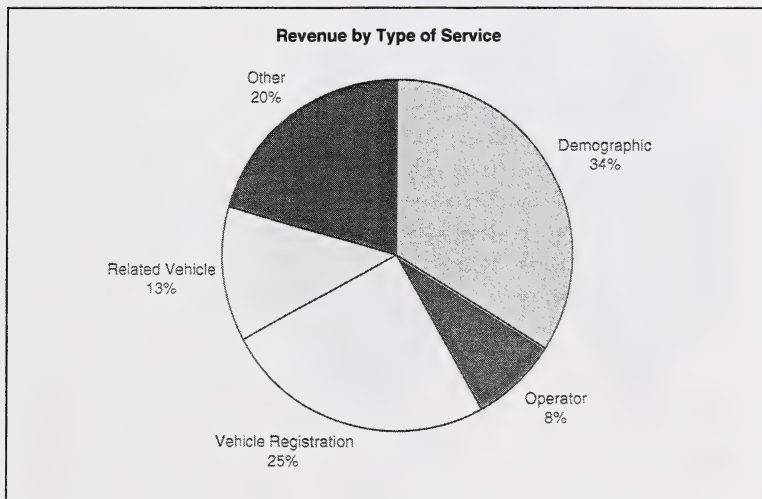






### Analysis of Revenue by Type of Service

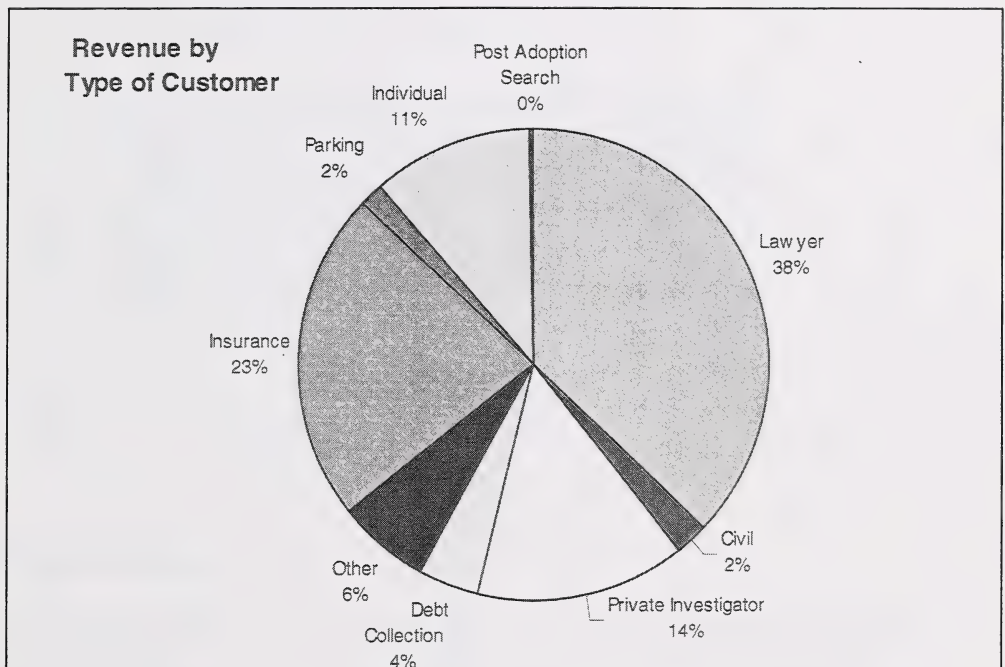
- Based on the assumption that certain services may be eliminated, the revenue lost for all respondents combined for demographic searches would be approximately \$300,000, vehicle registration searches approximately \$200,000, and “other” searches approximately \$200,000. Most respondents felt that drivers’ abstracts would fall into the “other” category. The actual impact on vehicle registration reports may not be as large as indicated, as much of the information contained on this report is not considered to be “personal”. An analysis of respondents’ revenue by type of search is provided below:





**Analysis of Revenue by Type of Customer**

- Lawyers and insurance companies are the largest customer groups serviced by Registry Agents. The revenue lost for all respondents combined if access by lawyers is eliminated would be approximately \$400,000, and approximately \$250,000 for insurance companies. An analysis of revenue by type of customer is provided below:

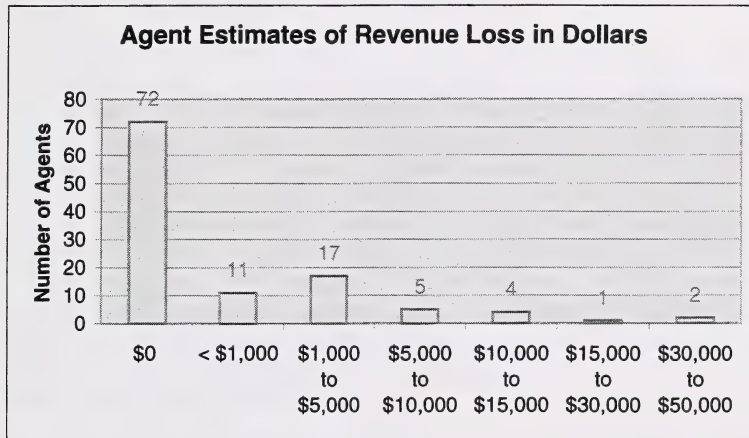






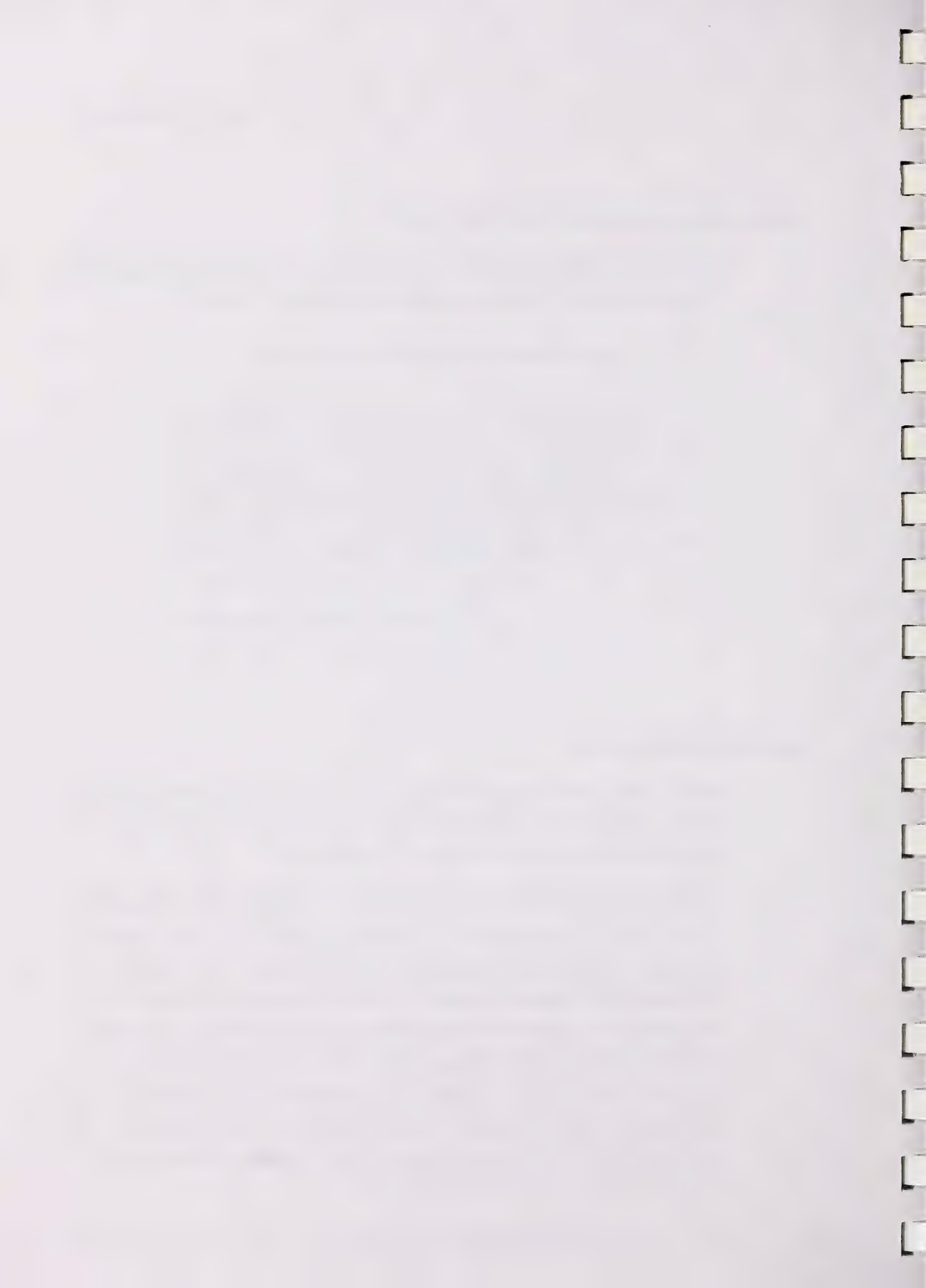
### Registry Agent Estimates of Financial Impact

- When Registry Agents were asked to provide their estimate of the loss in revenue resulting from the recommendations, individual responses ranged from \$0 to \$45,000. The total impact for all respondents combined is approximately \$250,000.



### Analysis of Ancillary Costs

- Many Registry Agents expressed the view that they were less concerned with loss of revenue than they were about the additional costs and complexity associated with security, training, and administration requirements. Registry Agent responses to questions regarding the cost of compliance are outlined below:
- Additional training costs average approximately \$25 per employee. The range is from \$4 to \$175 per employee. This calculation is based on survey responses to question #11 (length of time to train employees on anticipated standards) and salary information provided in questions #13 – #15. It is based on the assumption that Registry Agents will incur additional wage costs for all training. In reality, some or all of the training may be scheduled within an employee's standard workday without incurring additional costs.
- The additional administrative costs per transaction to file driver abstract documentation are approximately \$0.75/transaction. The range is from \$0 to \$4 per transaction, and the median cost is approximately \$0.50/transaction. This calculation is based on survey responses to questions #13 – #16 (additional time required to file documentation and average salary information). It is based on the assumption that Registry Agents will incur additional wage costs for the increased administrative filing requirements. In reality, some or all of the additional filing tasks may be performed within an employee's standard workday without incurring additional costs.



- The cost to upgrade filing and storage facilities to comply with the new requirements ranges from \$0 to \$4,000 per Registry Agent. The average cost per Registry Agent is approximately \$600 and the median cost is \$500. This calculation is based on responses to question #18. Where additional costs were identified, most Registry Agents indicated a need to install locks or purchase locking file cabinets. It should be noted that there was a poor response rate for this question, with only 35 Registry Agents responding. Most respondents indicated that they could not provide an estimate, or the question was left blank.
- Based on responses to questions #24 – #26, the average cost per agency for adding computer terminals to comply with the requirement to use separate user identifications is approximately \$4,500. The cost ranges from \$0 to \$35,000. Using the average, the total cost to provide each Registry Agent with one new terminal is \$1,035,000 (using 230 Registry Agents).
- The average annual cost per Registry Agent to change locks after every employee termination is approximately \$200, and over half the Registry Agents indicated that there would be a \$0 cost. This calculation is based on responses to questions #27 – #28 (the cost to change locks and employee turnover estimates). The cost ranges from \$0 to \$35,000 (the range is large due to one Registry Agent with extremely high turnover). In reality, a Registry Agent could install a card key system for a fraction of the \$35,000 if they experience high turnover.
- Based on responses to question #29, the average cost to change the safe to comply with new regulations is approximately \$300. The cost ranges from \$0 to \$4,000.

## **Other Comments**

- Registry Agents are primarily concerned about recommendation 14, which deals with office security issues including, storage of documents that contain personal information, and security of system passwords. Registry Agents feel that the recommendations pertaining to office security and individual passwords are unnecessary intrusions into their business practices. Most Registry Agents feel that the recommendations do not take into consideration that:
  - most Registry Agents have independent security systems, which negate the need for lock changes upon employee turnover;
  - many Registry Agents operate other businesses in addition to providing registry services;
  - signing on and off of MOVES is unrealistic due to the time required to log into the system; and
  - Registry Agents are accountable for their staff, and should be responsible for monitoring transactions.
- Registry Agents are concerned with the requirement to monitor search requests, primarily due to the impact on staff and training needs. Many feel that Alberta Municipal Affairs must be very clear in terms of who has access to information and who





does not have access. A number of Registry Agents felt that they would have to increase their staff skill sets to decipher legal documents, and many indicated that they would prefer to eliminate searches from their business portfolio than be responsible for final determination of appropriate access. In addition, the Registry Agents are concerned about liability. Who is ultimately responsible if information is released inappropriately? Registry Agents feel that this gatekeeper role is unwieldy, and would prefer to follow simple and concise guidelines from Alberta Municipal Affairs, rather than make internal determinations on access.



## **Summary**

Throughout the consultation process, a number of key themes emerged. Users, Registry Agents and the public indicated to PricewaterhouseCoopers that the final recommendations should:

- strike an appropriate balance – stakeholders indicated that, although protection of privacy is important, in some circumstances access to information is desired;
- include standards – stakeholders indicated that Alberta Registries should develop and implement clear and practical standards and procedures in terms of access to information; and
- consider the costs of implementing – stakeholders indicated that costs to users, consumers, Registry Agents and Alberta Registries will result from the implementation of the recommendations.



## Recommendations

### Key Recommendations

Following are the five recommendations that were the focus of consultation with information users, Registry Agents and the public:

Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
<p>"1 In order to protect the personal information of Albertans from inappropriate disclosure and consequent misuse, it is recommended that the Minister responsible for Alberta Registries consider the advisability of making personal information in the Office of the Registrar of Motor Vehicles Services fully subject to Part 2 of the Freedom of Information and Protection of Privacy Act.</p> <p>Alternatively, it is recommended that Alberta Registries consider adopting fair information practices that are equivalent to the Freedom of Information and Protection of Privacy Act with respect to the use, disclosure and protection of personal information in the Motor Vehicles Registry. (Recommendation #7 provides more detail.)"</p>	<p>See PricewaterhouseCoopers' recommendation #1 (below)</p>
<p>"7 While we recognize that the use and disclosure of personal information in the Office of the Registrar of Motor Vehicles is not subject to the Freedom of Information and Protection of Privacy Act, we believe that Albertans expect that the protection of privacy provisions should apply to the use and disclosure of registry information.</p> <p>It is recommended that Alberta Registries adopt fair information practices and disclose personal information only:</p>	<p>1. It is recommended that if a legal remedy is being pursued with respect to either civil legal proceedings or civil enforcement (Civil Enforcement Act), access to Motor Vehicle information be allowed.</p> <p>Examples of acceptable access to information under pursuit of legal remedy include:</p> <ul style="list-style-type: none"> <li>• access to name, address and physical description of debtors by sheriffs, bailiffs and civil enforcement agencies in order to locate debtors and to assist in investigations ;</li> </ul>





Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
<ul style="list-style-type: none"> <li>• if the disclosure is consistent with the original purpose for which the information was collected; or</li> <li>• if there is legislative authority for disclosure; or</li> <li>• if informed consent has been obtained; or</li> <li>• if disclosure is for a purpose consistent with the provisions of sections 38, 40 and 41 of the Freedom of Information and Protection of Privacy Act, which specifies the circumstances under which a public body may disclose personal information."</li> </ul>	<ul style="list-style-type: none"> <li>• access to address identification/confirmation by lawyers trying to find addresses to serve court documents (lawyers must have a case pending in order to access this information);</li> <li>• access to names and addresses of writers of cheques with insufficient funds when a driver's licence number has been provided as identification or implied consent;</li> <li>• access to names, addresses and physical descriptions of individuals by private investigators (PI's) subcontracted by a lawyer or an insurance company, or where a case is being investigated. PI's must provide proof of 'legitimacy' prior to obtaining any information. In addition, PI's should be: <ul style="list-style-type: none"> <li>➢ licenced and bonded,</li> <li>➢ employed by a registered agency, with proof of general liability insurance in a minimum amount of \$1 million, and</li> <li>➢ registered as a member of the Alberta Association of Private Investigators, and thereby be subject to its Code of Ethics; and</li> </ul> </li> <li>• access to name and address information by private parking companies should be continued under certain conditions. These conditions include: <ul style="list-style-type: none"> <li>➢ large signs must be displayed by the ticket dispenser informing the consumer of the parking lot requirements,</li> <li>➢ a phone number for consumer complaints must be provided on the signs. This phone number should be monitored by the parking company,</li> </ul> </li> </ul>



Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
	<ul style="list-style-type: none"> <li>➤ the signs must indicate that the parking company may use licence plate information to send notices of violation to illegally parked vehicles, and</li> <li>➤ the proof of violation rests with the parking company.</li> </ul> <ol style="list-style-type: none"> <li>2. It is recommended that electronic batch interfaces should be used in place of direct access to the Motor Vehicles Registry to prevent browsing. However, users who require information immediately in order to make decisions regarding the arrest or detainment of individuals or regarding the immediate impounding of vehicles (ie. University campus security officers), should continue to have direct access. Direct access for parking control purposes should be disallowed.</li> <li>3. It is recommended that Alberta Registries implement a clear and practical compliance model detailing access provisions. It is our understanding that Alberta Registries has developed such a model, with the necessary computer enhancements in progress. This model should delineate the standards by which access to the Motor Vehicles Registry is allowed, and should address the circumstances described above. An audit function must be identified to ensure that users of the Motor Vehicles Registry information are abiding by their access agreement. Consequences of abuse must be clear, and should include revocation of Motor Vehicles Registry access.</li> <li>4. It is recommended that Alberta Registries consider establishing an independent body to periodically review access standards and to provide an</li> </ol>





Alberta's Auditor General and Privacy Commissioner's Recommendations	PricewaterhouseCoopers' Recommendations
	<p>objective mechanism for appeal when an application for access is denied.</p> <p>5. It is recommended that adoption search agencies continue to receive name and address information from the Motor Vehicle Registry. These agencies have protection of privacy tools in place, and should receive special consideration.</p>
<p>"8. It is recommended that Alberta Registries monitor the disclosure of driver abstracts to ensure consent is obtained in compliance with the Motor Vehicles Registry legislation."</p>	<p>6. Alberta Registries should proceed with the Auditor General's and Privacy Commissioner's recommendation 8. Although the insurance companies indicated that the general public would be negatively impacted by the requirement to obtain informed consent from all members of a household, the public indicated a desire to provide informed consent with regard to insurance company access to their driver abstracts. As the legislation is currently in place to address this issue (MVAA, Section 66), it is recommended that Alberta Registries proceed with the implementation of recommendation 8.</p>
<p>"9. It is recommended that Alberta Registries ensure that the personal information disclosed to clients is used in accordance with the terms of the access agreements between Alberta Registries and those clients."</p>	<p>7. Our stakeholder consultations did not reveal significant concerns with this recommendation. Alberta Registries should proceed with the Auditor General's and Privacy Commissioner's recommendation 9 in conjunction with the compliance model and the terms indicated above.</p>
<p>"10. In order to ensure that access to the Motor Vehicles Registry is restricted uniformly, it is recommended that Alberta Registries establish standards and conditions for granting access privileges, and regularly update its records."</p>	<p>8. Both public and user stakeholders were supportive of the Auditor General's and Privacy Commissioner's recommendation 10. Alberta Registries should proceed with recommendation 10 in conjunction with the compliance model and the terms indicated above.</p>



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# **APPENDIX A**

## **User Workbook**



# **Alberta Municipal Affairs, Registries**

## **Moving Forward - Your Invitation to Help Define Standards For Access to the Motor Vehicles Registry in Alberta**

*Stakeholder Consultation Workbook*

*May 1998*



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MUNICIPAL AFFAIRS

Registries





## Invitation

Alberta Registries has a responsibility to collect and retain information in the Motor Vehicles Registry. To address this responsibility, Alberta Registries asked for an audit by both Alberta's Privacy Commissioner and the Auditor General. Their report pointed to some issues on how information is collected and shared. It recommends a number of steps to protect the privacy of information in the Motor Vehicles registry.

Before Alberta Registries goes ahead and takes action, it wants to assess the implications fully.

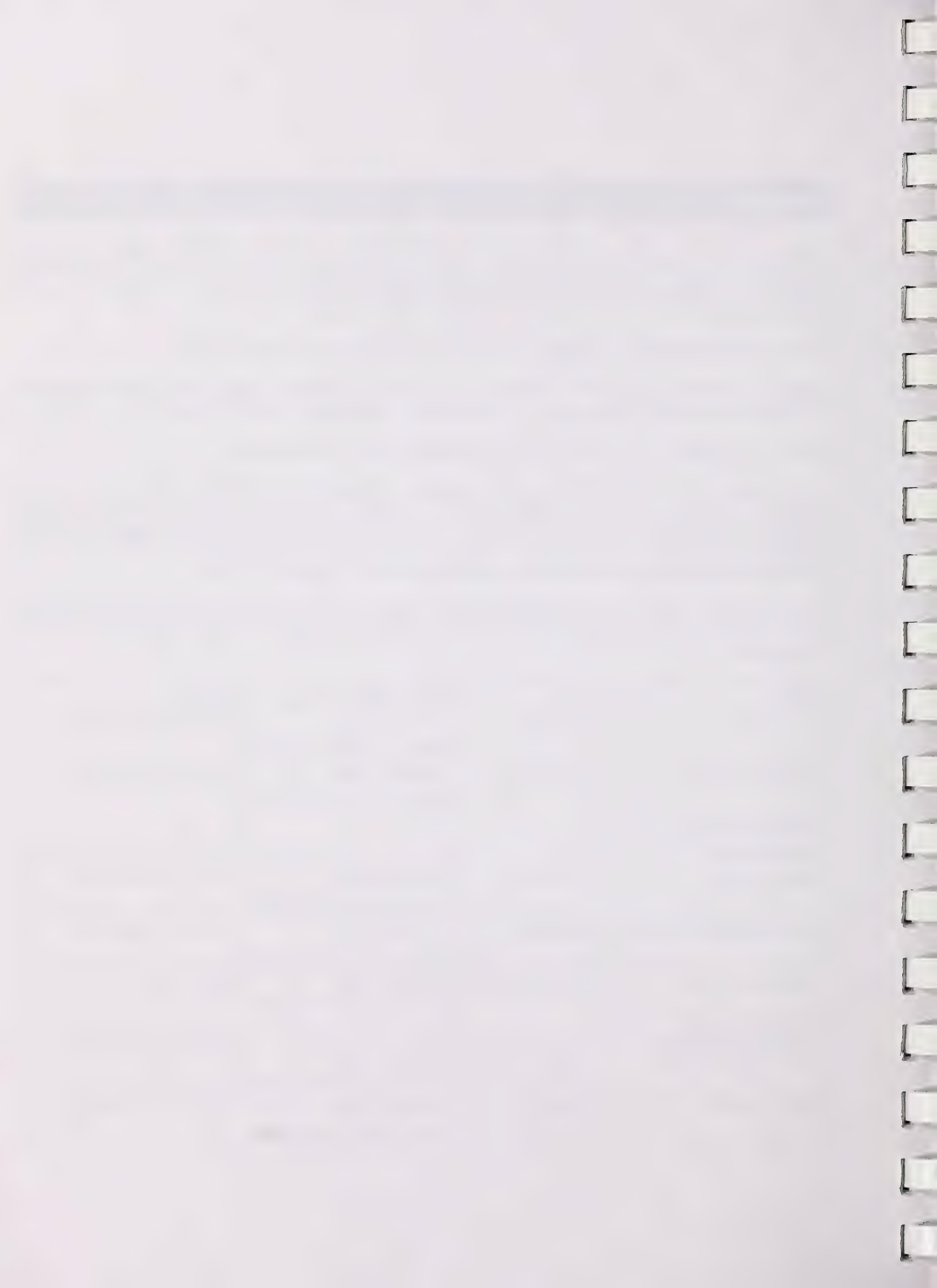
Alberta Registries has engaged Price Waterhouse to undertake a consultation process with Registry Agents and with organizations which regularly access and use information from the Motor Vehicles registry.

Based on the results of the consultation, new policies and standards will be developed.

Price Waterhouse and Alberta Registries have developed a stakeholder consultation workbook which includes background information on the consultation process, a preliminary assessment of impact, including anticipated standards, and a questionnaire. 12 workshops are being held to review and refine ideas and suggestions provided through the workbook. Alberta Registries will use this feedback to develop practical standards, which will be presented to stakeholders through a second series of stakeholder consultation workshops.

Workshops will be held on the following days: **(Please phone Tracy Heron at Price Waterhouse (493-8269) by May 28 to confirm your attendance.** Confirmation of attendance is important so that we may properly plan for each session.)

Group	City	Meeting Place	Date
Insurance	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 02, 8:30-12:00 pm
Collection Agencies	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 03, 8:30-12:00 pm
Financial Institutions			
Civil Enforcement			
Parking (private)	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 09, 8:30-12:00 pm
Parking (hospitals/University)	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 09, 1:00-4:30 pm
Security companies	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 10, 8:30-12:00 pm
Private investigators			
Post-adoption agencies	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 10, 1:00-4:30 pm
Legal profession	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 11, 8:30-12:00 pm



Group	City	Meeting Place	Date
Registry Agents	Calgary	J.J. Bowlen Building, 2nd Floor, 620-7 Ave SW Calgary	June 16, 1:00-4:30 pm
	Lethbridge	Lethbridge Lodge, 320 Scenic Drive	June 17, 8:30-12:00 pm
	Red Deer	Capri Convention Centre, 3310-50 Ave., Red Deer	June 18, 1:00-4:30 pm
	Edmonton	Commerce Place 3 <sup>rd</sup> Floor, 10155-102 St. Edm	June 23, 8:30-12:00pm
	Grande Prairie	Grande Prairie Inn, 11633 Clairmont Road	June 24, 1:00-4:30 pm

Once stakeholder consultations have been completed, further input will be obtained through public consultations.

We realize that not all interested stakeholders will have the opportunity to attend a scheduled workshop, so we have included a questionnaire on page 12. **Workshop participants are welcome to complete this questionnaire and bring it to the workshop, as this material will be covered during the session.**

We value your input - your participation in this process will help us to deliver new policies and procedures. Thank you in advance for your interest and participation.

We would appreciate it if you would return your completed questionnaire as soon as possible, but no later than **June 30, 1998**. Please fax your completed questionnaire to:

**Price Waterhouse, attn: Tracy Heron**  
**Fax: (403)493-8272**

Price Waterhouse is an independent firm that has been retained to coordinate the consultations and compile stakeholder feedback.





## **FYI - There are currently other privacy initiatives underway**

Other consultation processes have been initiated in relation to privacy legislation. An all-party committee of the legislature has been struck to review the Freedom of Information and Protection of Privacy Act. The committee will consult with all interested Albertans to help them determine if the Act is meeting the intent of the legislation in balancing access to information with protecting the privacy of individuals. Alberta Registries has provided the Committee its list of stakeholders. The Committee expects to have discussion papers sent out by mid May and will accept public feedback until June 30, 1998. The committee is expected to submit its final report to the Alberta Legislature by October 31, 1998.

This review and consultation is separate from the process Alberta Registries is conducting. The Registries' consultation will focus only on the impact recommendations 1,7,8,9 and 10 of the Information and Privacy Commissioner's audit will have on its stakeholders and how best to implement these recommendations. The all-party committee's review encompasses an examination of the whole Act.

In addition, Alberta Health will be consulting stakeholders in regard to the handling of personal information in the Health sector. Registry agents will be included in this process because of their involvement in reviewing medical reports which are provided by applicants for driver licences.

## **Background**

Results of an Audit of the Motor Vehicles registry were released on April 22, 1998 by Iris Evans, Minister of Municipal Affairs. The Audit was jointly done by the Privacy Commissioner and the Auditor General at the request of Alberta Municipal Affairs.

The Audit identified 21 recommendations. Alberta Registries will proceed immediately with actions on 16, which deal with management controls and information systems.

Alberta Registries agrees in principle with the recommendations. However, five of the recommendations - those dealing specifically with protection of privacy of information in the Motor Vehicles registry - involve complex, contractual business arrangements that cannot be changed overnight. These five recommendations will require additional consultation, and are presented below.

### **Key Recommendations**

Following are the five recommendations which will be the focus of consultation with information users, registry agents and the public:

- "1 In order to protect the personal information of Albertans from inappropriate disclosure and consequent misuse, it is recommended that the Minister responsible for Alberta Registries consider the advisability of making personal information in the Office of the Registrar of Motor Vehicles Services fully subject to Part 2 of the Freedom of Information and Protection of Privacy Act.

Alternatively, it is recommended that Alberta Registries consider adopting fair information practices that are equivalent to the Freedom of Information and Protection of Privacy Act with respect to the use, disclosure and protection of personal information in the Motor Vehicles Registry. (Recommendation #7 provides more detail)"



"7 While we recognize that the use and disclosure of personal information in the Office of the Registrar of Motor Vehicles is not subject to the Freedom of Information and Protection of Privacy Act, we believe that Albertans expect that the protection of privacy provisions should apply to the use and disclosure of registry information.

It is recommended that Alberta Registries adopt fair information practices and disclose personal information only:

- if the disclosure is consistent with the original purpose for which the information was collected; or
- if there is legislative authority for disclosure; or
- if informed consent has been obtained; or
- if disclosure is for a purpose consistent with the provisions of sections 38, 40 and 41 of the Freedom of Information and Protection of Privacy Act, which specifies the circumstances under which a public body may disclose personal information."

"8 It is recommended that Alberta Registries monitor the disclosure of driver abstracts to ensure consent is obtained in compliance with the Motor Vehicles legislation."

"9. It is recommended that Alberta Registries ensure that the personal information disclosed to clients is used in accordance with the terms of the access agreements between Alberta Registries and those clients."

"10. In order to ensure that access to the Motor Vehicles Registry is restricted uniformly, it is recommended that Alberta Registries establish standards and conditions for granting access privileges and regularly update its records."



## The Consultation Process

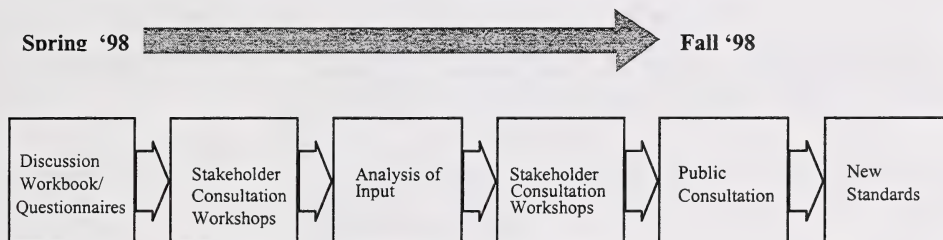
The stakeholder consultation process being managed by Alberta Registries will provide Registry Agents and organizations which regularly access and use information from the Motor Vehicles registry with an opportunity to express needs, ideas, and approaches on the five recommendations. This workbook focuses on some of the anticipated standards that will be addressed in order to develop new policies and procedures related to privacy of information in the Motor Vehicles registry.

The consultation allows for input through a variety of ways. A series of initial workshops will be held with stakeholders and a questionnaire will be provided to enable additional feedback.

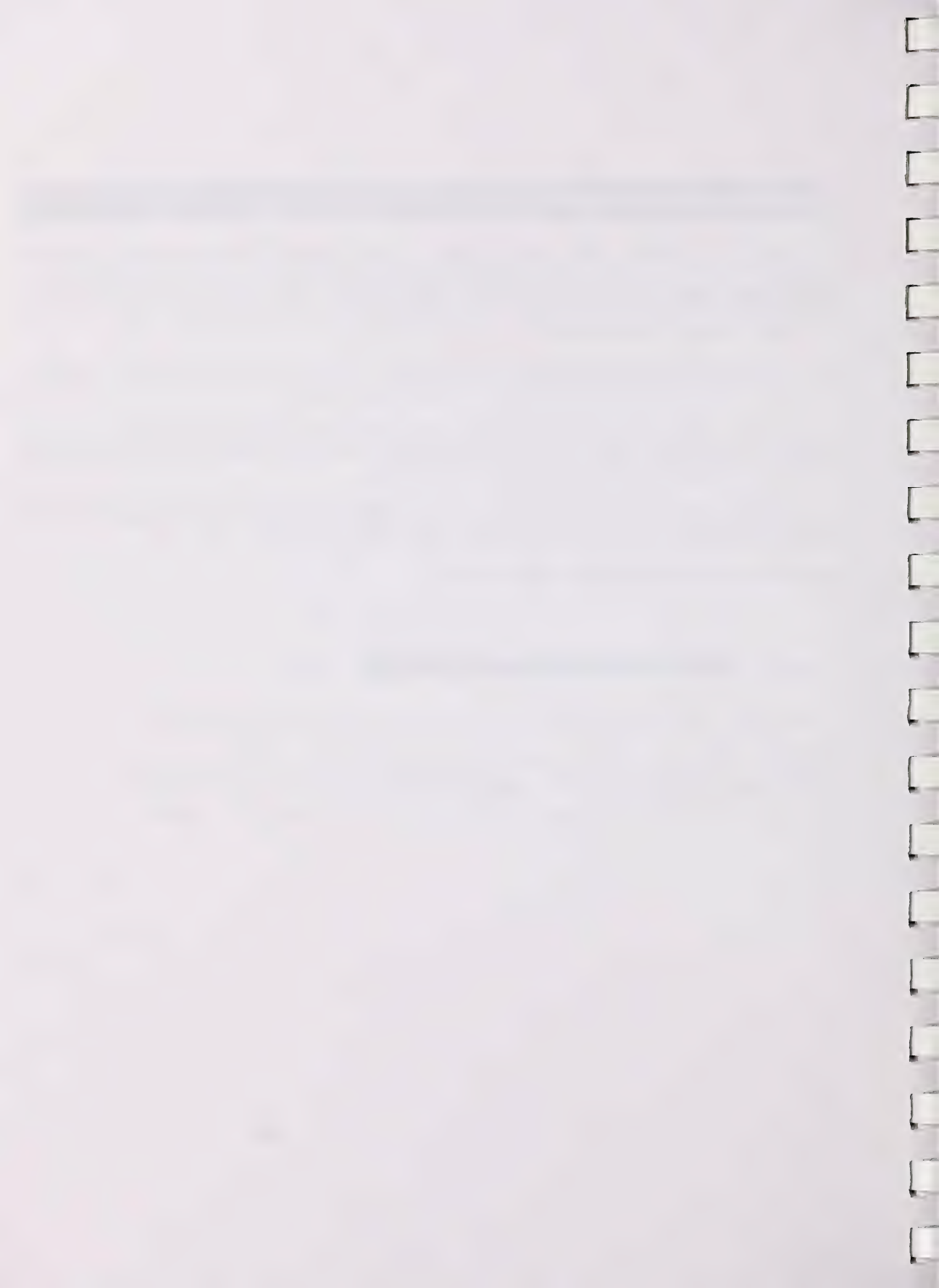
The input will be analyzed by Price Waterhouse and Alberta Registries and used to develop new policies and procedures. A second series of workshops will be conducted with stakeholders to review the findings from the initial stakeholder consultation workshops and completed questionnaires.

Public consultation will commence once the stakeholder consultations with Registry Agents and organizations which regularly access and use information from the Motor Vehicles registry are complete.

An overview of the process is depicted graphically below:







## How can you prepare for the workshop?

In order for the workshops to proceed efficiently, it is suggested that the following material be reviewed prior to attending the session:

1. The workbook
2. The attached documents which will help you to understand the Freedom of Information and Protection of Privacy Act (FOIP):
  - Freedom of Information and Protection of Privacy - A Guide
  - Pamphlet - Office of the Information and Privacy Commissioner
3. Excerpts from the Act and its associated Regulation
4. Standard search reports

Following is a description of standard search reports which are available to users who are eligible in accordance with current policy standards:

Search Form	Description
Demographic	The report will display: search criteria used to request the report, report request date, MVID, name, address and certain personal information about the client (eg. physical description, birth date, gender)
Operator	The report will display: search criteria used to obtain the report, report request date, MVID, licence number, name, date of birth, class of licence, condition codes and expiry date.
Vehicle Registration	The report will display: search criteria used to obtain the report, report request date, registration expiry date, owner MVID and vehicle registration address (if any), vehicle description and colour, plate and tab number, and vehicle status.
Related Vehicle	The report will display: search criteria used to obtain the report, report request date, serial numbers, years and make of vehicles, expiry date of registration, and whether or not the registrant is a member of a joint client MVID.
Driver Abstract	This is a three year chronological record of demerit point convictions, and licence suspensions.



### **Other Search Access**

Following are other methods of access which have been provided to users who are eligible in accordance with current standards:

<b>Type of Access</b>	<b>Description</b>
Limited Demographic Search (Electronic Batch Interface)	This is an over-night electronic file transfer which provides the name and address of registered vehicle owners by plate number.
Terminal Access	This is real time access to the MOVES database, excluding certain sub-systems, e.g., Enforcement

Sample search reports have been included in your package for your review.





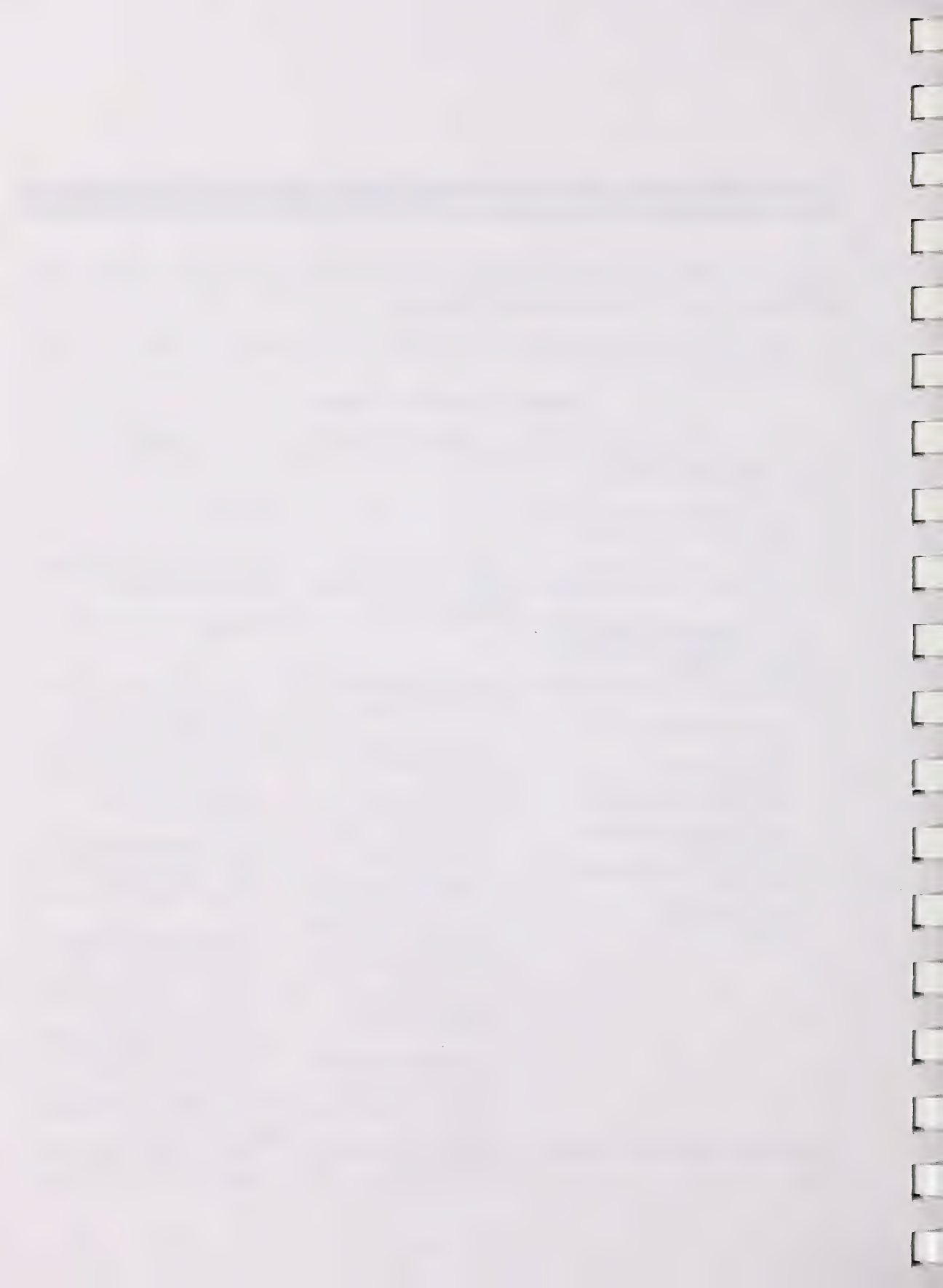
## Comparison For Discussion Purposes

Following is a comparison of current and anticipated standards for access to information in the Motor Vehicles Registry. This comparison is based on an analysis by Registries of the FOIP Act in relation to current uses of the standard search reports and non-standard access mechanisms.

This analysis is based on full implementation of the five key recommendations of the Registries Audit, and is provided for discussion purposes only.

### Comparison For Discussion Purposes

Current Standard	Anticipated Standard	Change
<p><u>Any standard search report</u> may be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Any individual</u> in relation to their own personal information or their own vehicles.</li> <li>• <u>Any person</u> with informed consent of the individual to whom the information pertains.</li> </ul>	<p>Informed consent must be obtained in accordance with legislated standards.</p>	<p>No change</p> <p>See attached excerpt from Section 6 of the FOIP Regulation</p>
<p><u>The Vehicle Information Report</u> and <u>Vehicle Registration Report</u> can be obtained by <u>any person</u></p>		<p>No change</p>
<p>A <u>Demographic</u> search may be obtained by :</p> <ul style="list-style-type: none"> <li>• Any person presenting a court document.</li> <li>• <u>Private Investigators</u></li> <li>• <u>Debt Collection Agencies</u> with a Personal Property Registration.</li> <li>• <u>Post Adoption Search Agencies</u></li> <li>• <u>Parking Authorities</u></li> <li>• <u>Building Owners and Managers</u> for parking control</li> <li>• <u>Bankruptcy Trustees</u></li> <li>• <u>Insurance Investigators</u></li> </ul>	<p>A <u>Demographic</u> search would only be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Any person</u> in respect to their own personal information.</li> <li>• <u>Any Person</u> with the informed consent of the individual to whom the information pertains.</li> <li>• <u>Lawyers and Insurers</u> who represent parties involved in a motor vehicle accident.</li> <li>• <u>Bankruptcy Trustees</u> in relation to the bankrupt and their vehicles.</li> <li>• <u>Bylaw Enforcement Authorities</u> for parking control.</li> <li>• <u>Private Investigators and others</u> only to locate missing persons in the context of Section 38(1)q of the FOIP Act.</li> </ul>	<ul style="list-style-type: none"> <li>• A court document in itself would not be adequate to obtain a demographic search <u>unless</u> it directs Registries to provide the information <u>or</u> is presented by a <u>lawyer or insurer</u> representing a party to a motor vehicle accident.</li> <li>• <u>Private Investigators</u> could only obtain a demographic search to locate a missing person in the context of Section 38(1)q of the Act.</li> <li>• <u>Parking Authorities, Building Owners &amp; Managers</u> could not obtain a demographic search unless they are acting as <u>Bylaw Enforcement Authorities</u>.</li> <li>• <u>Post Adoption Search Agencies</u> would not be eligible to obtain demographic searches.</li> <li>• <u>Debt Collection Agencies</u> would be required to have the informed consent of the debtor.</li> </ul>
<p>An <u>Operator Search</u> may be obtained by:</p>	<p>An <u>Operator Search</u> would only be obtained by:</p>	<ul style="list-style-type: none"> <li>• Access by <u>lawyers and insurers</u> would be restricted to research</li> </ul>



Current Standard	Anticipated Standard	Change
<ul style="list-style-type: none"> <li>• <u>Lawyers</u></li> <li>• <u>Insurers</u> investigating claims</li> <li>• <u>Private Investigators</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Any person</u> in respect to their own personal information.</li> <li>• <u>Any Person</u> with the informed consent of the individual to whom the information pertains.</li> <li>• <u>Lawyers and Insurers</u> representing parties involved in motor vehicle accidents.</li> </ul>	<p>of motor vehicle accidents.</p> <ul style="list-style-type: none"> <li>• <u>Private Investigators</u> would no longer be eligible.</li> </ul>
<p>A <u>Related Vehicles Search</u> may be obtained by:</p> <ul style="list-style-type: none"> <li>• Collection Agencies</li> <li>• Small Businesses</li> <li>• Financial Institutions with court documents or PPR registrations.</li> <li>• Private Investigators</li> <li>• Bankruptcy Trustees</li> <li>• Law Firms</li> <li>• Financial Institutions in respect to Bankruptcy/ receivership.</li> <li>• Financial Institutions for verification of collateral</li> <li>• <u>Insurers and Private Investigators</u> for insurance investigations.</li> </ul>	<p>A <u>Related Vehicle Search</u> would only be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Any person</u> in respect to their own personal information.</li> <li>• Any Person with the informed consent of the individual to whom the information pertains.</li> <li>• Bankruptcy Trustees in respect to the bankrupt.</li> <li>• Lawyers and Insurers representing parties involved in a motor vehicle accident.</li> </ul>	<ul style="list-style-type: none"> <li>• Collection Agencies, Small Businesses, Financial Institutions and Private Investigators would be able to perform Related Vehicle Searches with the informed consent of the individual.</li> <li>• Lawyers and Insurers would only be able to perform related vehicle searches with informed consent or in relation to a motor vehicle accident.</li> </ul>
<p>A <u>Driver Abstract</u> may be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Insurers</u> with the informed consent of the policyholders.</li> <li>• <u>Employers</u> with the informed consent of the employees.</li> </ul>	<p>A <u>Driver Abstract</u> would only be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Insurers</u> with the informed consent of each individual to whom the information pertains.</li> <li>• Employers with the informed consent of the employees.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Insurers</u> would require the informed consent of each adult to whom the information pertains, i.e., the policyholder and each adult member of the family.</li> </ul>
<ul style="list-style-type: none"> <li>• A <u>Limited Demographic Search (Electronic Batch Interface)</u> may be obtained by a private parking authority or a bylaw enforcement authority.</li> </ul>	<ul style="list-style-type: none"> <li>• A <u>Limited Demographic Search (Electronic Batch Interface)</u> would only be obtained by a <u>Bylaw Enforcement Authority</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Private parking authorities</u> would no longer be eligible.</li> </ul>
<ul style="list-style-type: none"> <li>• <u>Terminal Access</u> may be obtained by Hospitals and Post Secondary Institutions for the purposes of parking control.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Terminal Access</u> will be more strictly controlled to reduce access to the information which is actually required.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Hospitals and Post Secondary Institutions</u> would have to obtain Limited Demographic Searches through an electronic interface, or obtain a Demographic Search through a registry agent.</li> </ul>



## Questionnaire

To the Respondent:

Thank-you for taking a few minutes to answer these questions. Your answers, combined with those of other Motor Vehicle Information users, will provide valuable insights into the impact of the FOIP legislation on your business. Your responses are strictly confidential.

The questionnaire should be completed once you have reviewed the workbook and the background information provided.

We realize that not all interested stakeholders will have the opportunity to attend the scheduled workshops. As Alberta Registries would like as much feedback as possible from affected parties, we are also using this questionnaire to collect information. This questionnaire will provide individuals who can not attend the workshop with the opportunity to voice their comments and concerns pertaining to the FOIP legislation, as well, participants in the workshop are welcome to complete this questionnaire.

If you are not attending a workshop, we would appreciate it if you would return your completed questionnaire as soon as possible - no later than **June 30, 1998**. Please fax your completed questionnaire to:

**Price Waterhouse, attn: Tracy Heron**  
**Fax: 493-8272**

## Who are you?

We need to understand the views of different user groups. Please answer these questions so we can understand *your* point of view in relation to your position and interests. If you do not complete this section, we will be unable to use the rest of your responses.

1. Please *check* one only that best describes your business/organization.

Insurance Industry

Financial/Lending Institution

Collection Agency

Civil Enforcement

Automotive Industry

Parking Authority

Security company

Private Investigator

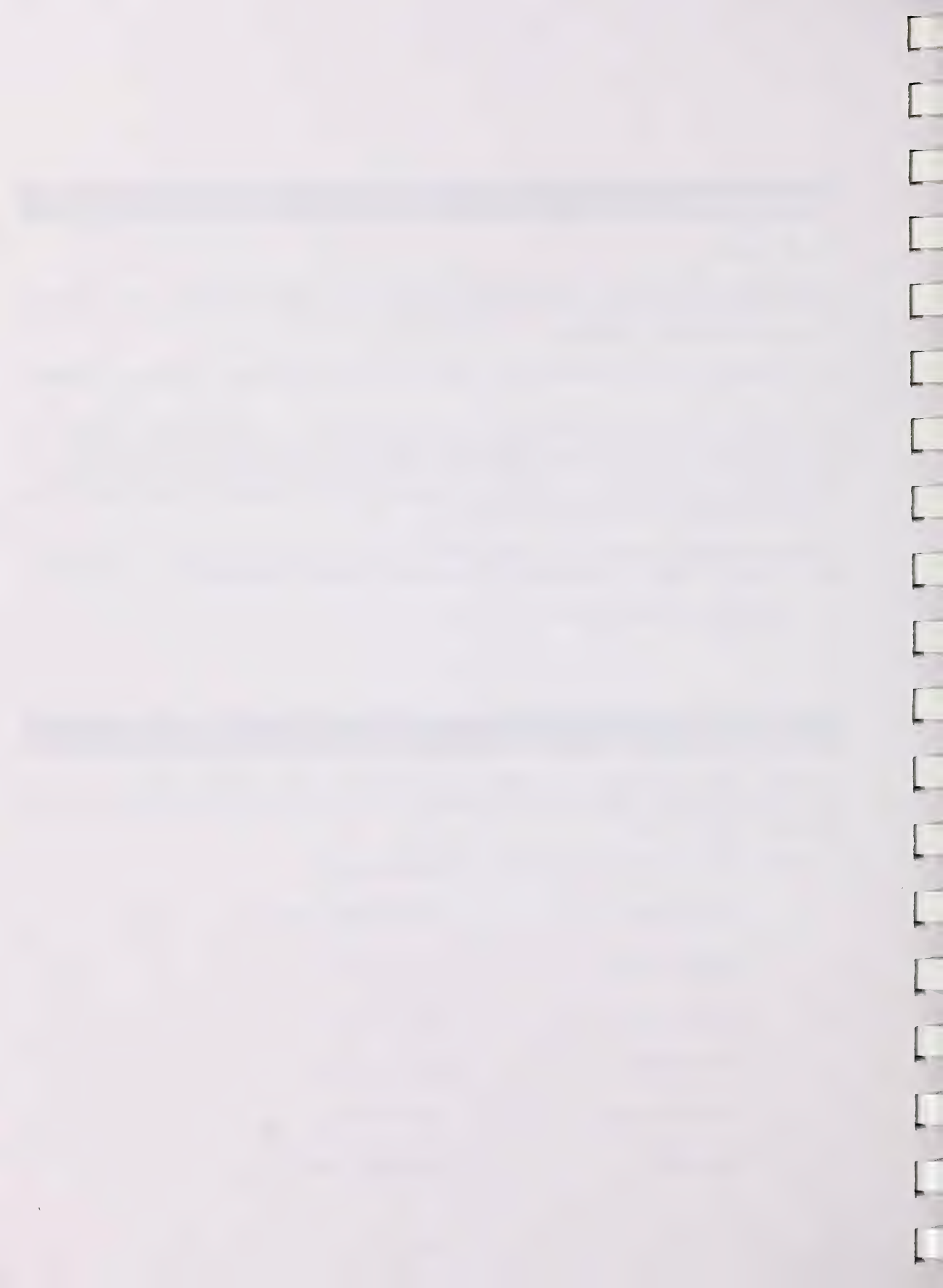
Post adoption service

Legal profession

Registry Agent

Other (please specify \_\_\_\_\_)

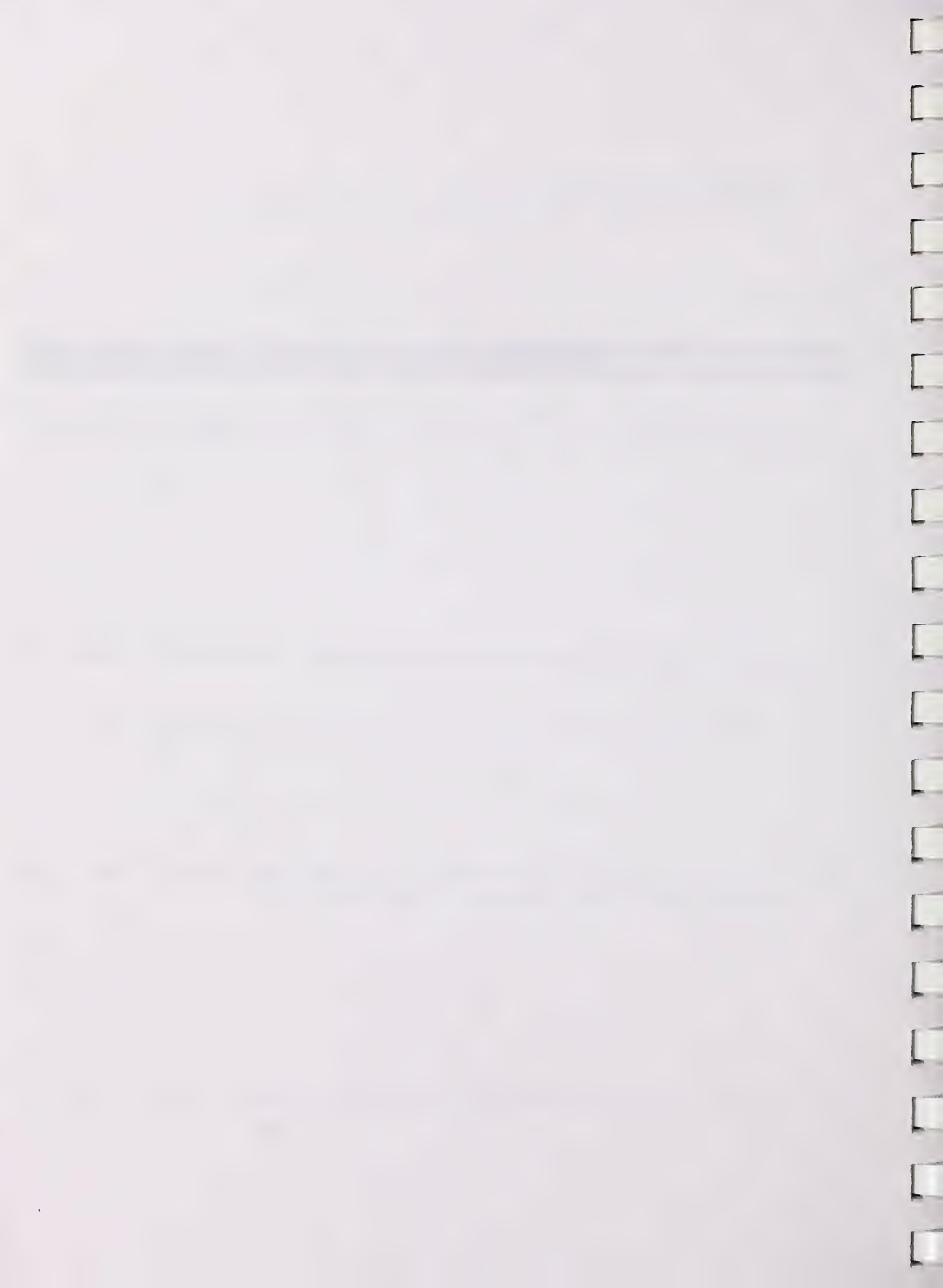




2. Where in Alberta do you operate?

## **Anticipated Standards**

3. In this workbook, we have tried to identify how the 5 recommendations might change the current standards of business (see pages 6-8). Do you agree with our assessment of the potential change? What would you add or remove?
4. How might these potential changes affect your business/organization? (financially, ability to do business, etc) What will have the biggest impact?
5. In order to comply with the 5 recommendations, what changes might you have to make in your business/organization? How long would it take you to make these changes?
6. How might your customers be affected if all 5 recommendations are accepted? Please be as specific as possible.



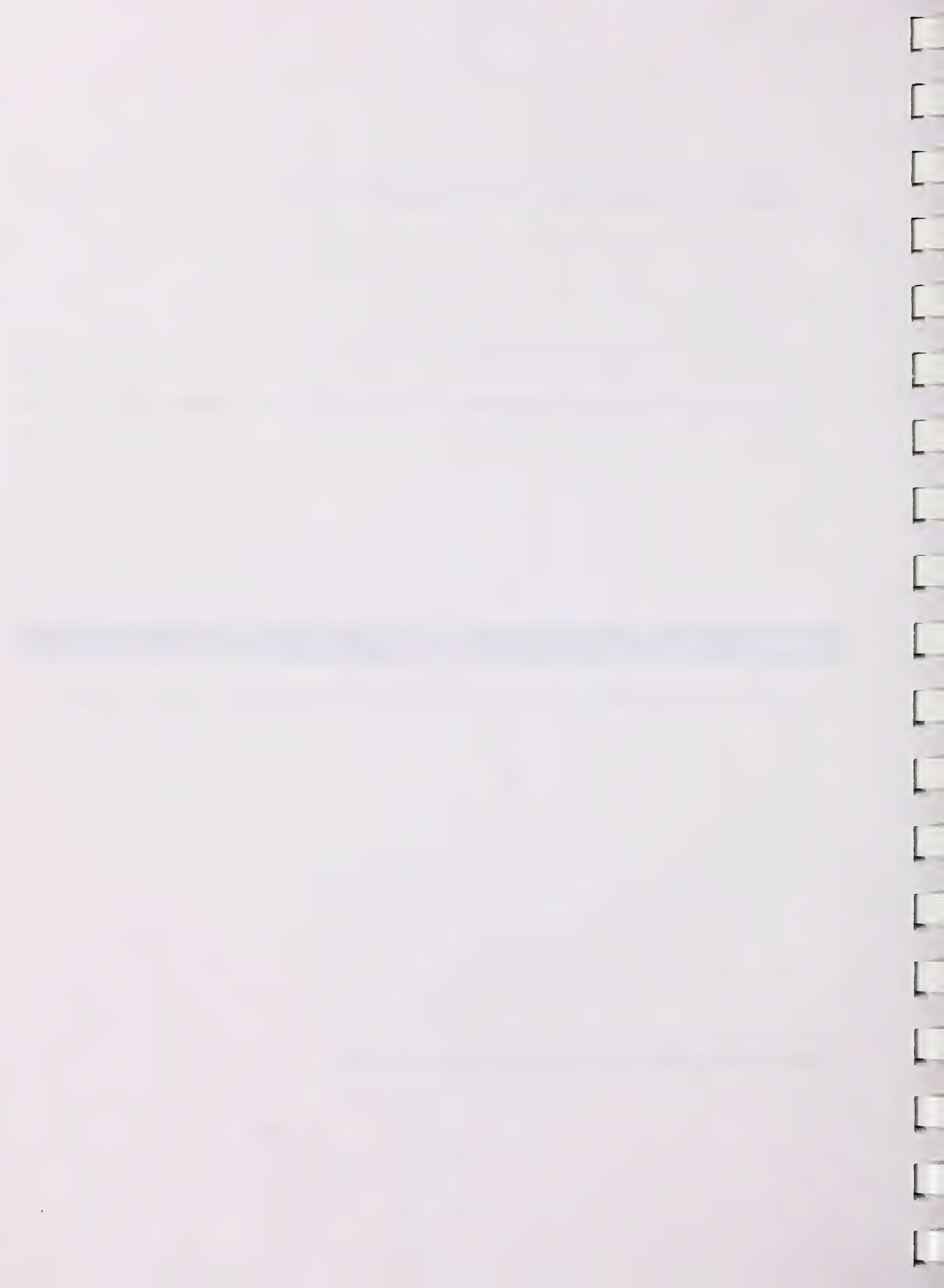
7. The anticipated standards are meant to achieve the objectives of the audit recommendations on the current standards. Do you believe the standards should be different? If so, how?

8. If you have suggested a different standard, please describe how that proposed standard would be in the public interest.

## Issues

9. Do you have any other issues or concerns with the 5 recommendations? Please be as specific as possible.

**Thank you for your taking the time to complete this questionnaire!**

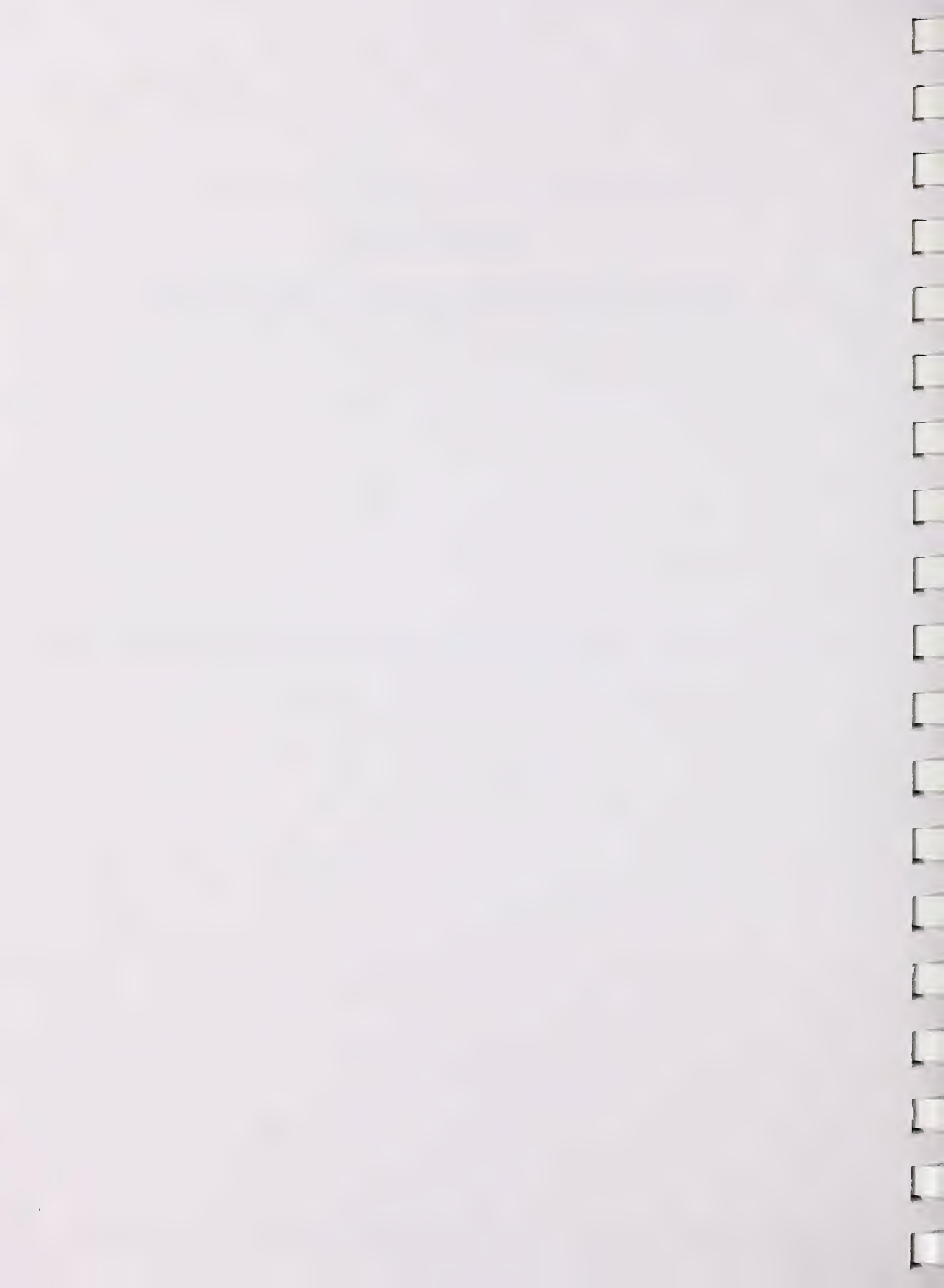


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## **APPENDIX B**

### **Public Research Focus Group Workbook**





# Public Consultation

Discussion booklet



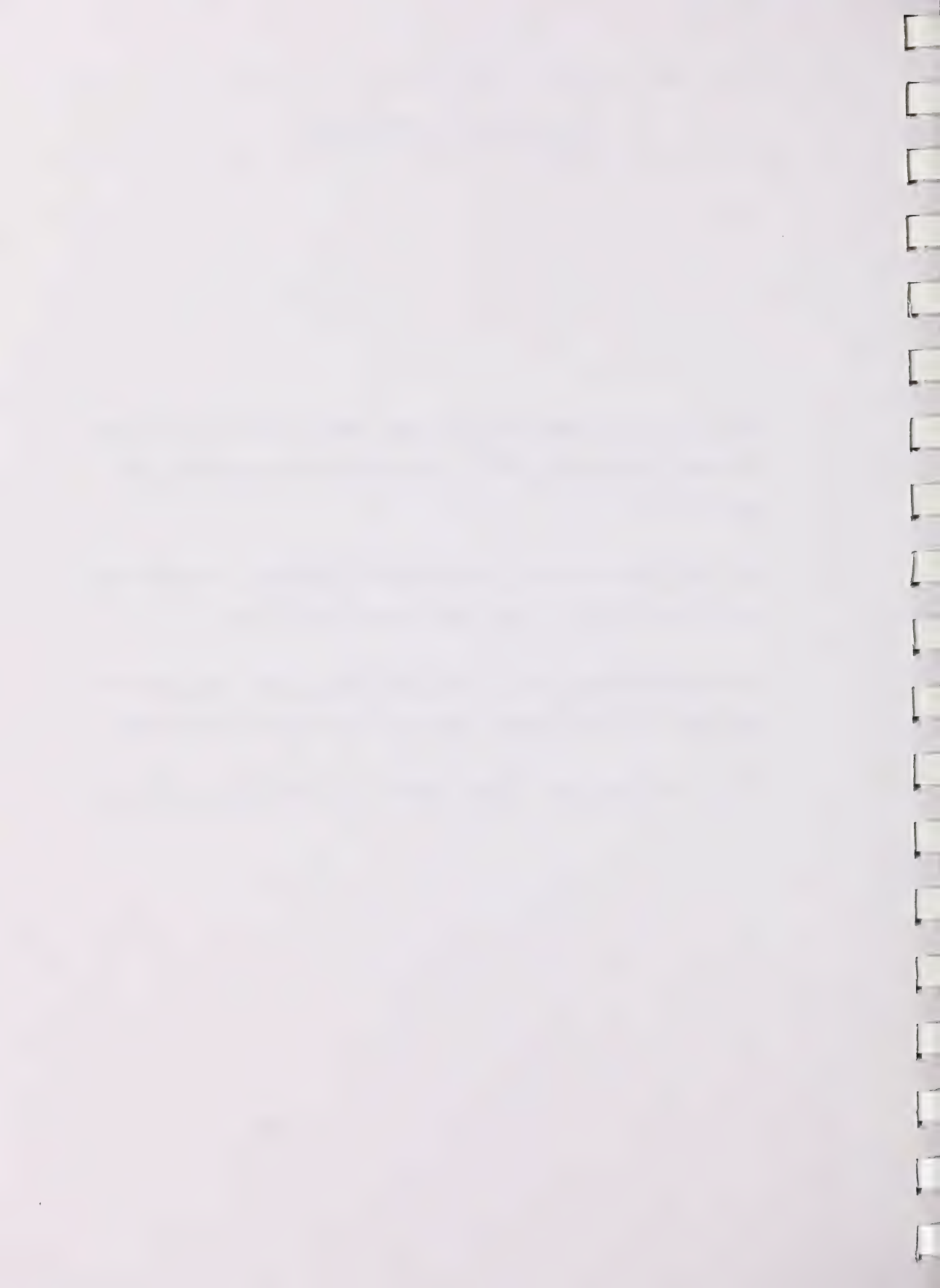
# Introduction

PricewaterhouseCoopers has been hired to discuss privacy concerns with individuals throughout the province

We will review at a number of potential situations, and discuss how you feel about each one

We want to discuss your opinions with you, there are no right or wrong answers to these questions

This process will be recorded by PwC for analysis

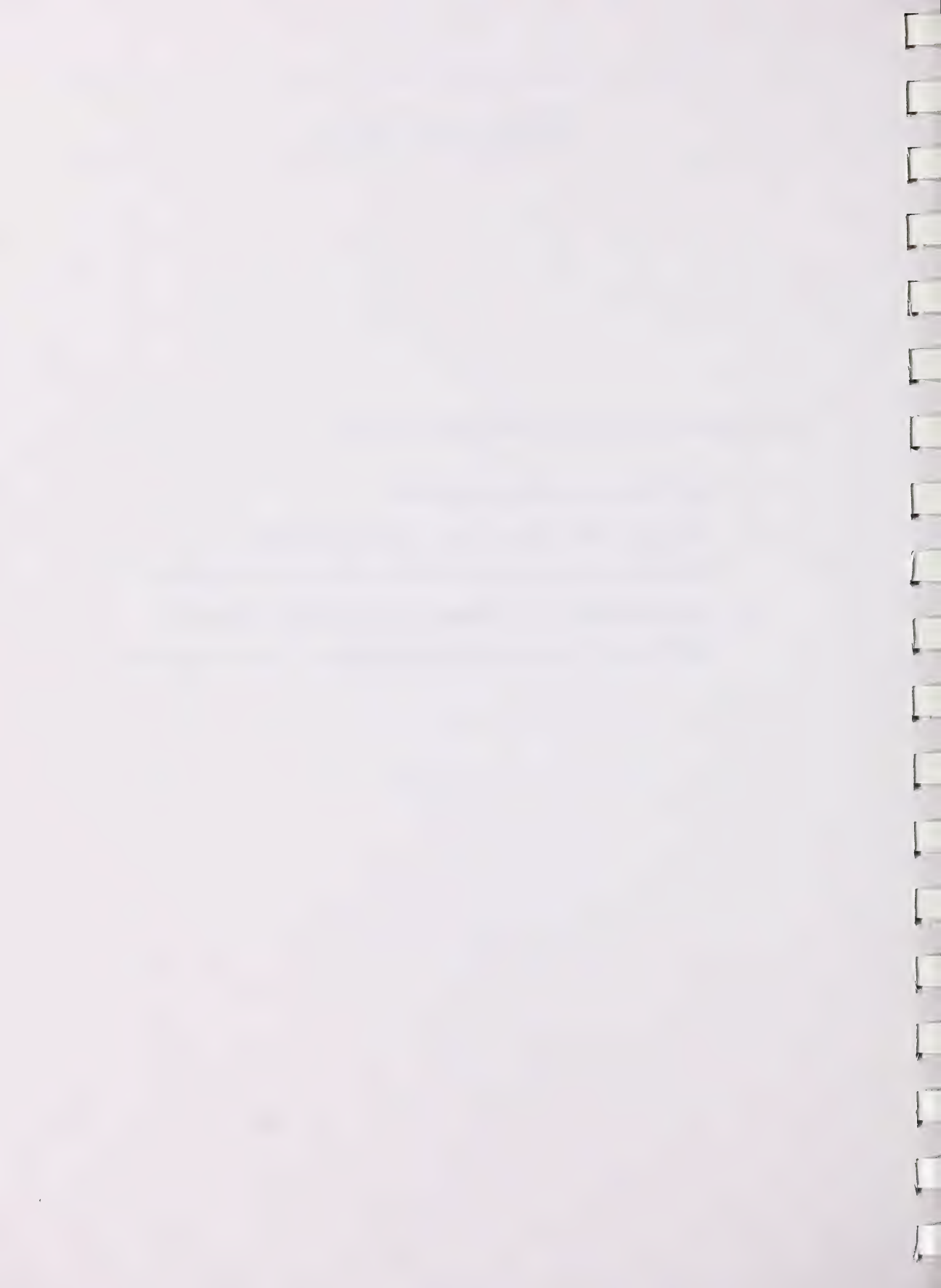


# Objectives

The objectives of this workshop are:

- To discuss privacy concerns
- To determine situations when disclosure of an individual's personal information is acceptable
- To determine situations when disclosure of an individual's personal information is unacceptable





# Personal Information

For the purposes of our workshop, personal information includes:

- Name
- Home address
- Gender
- Physical descriptors (ie. Height, weight)
- Date of birth

This does not include:

- Health or medical information
- Academic information
- Religious information



A. Les drives to an appointment downtown and parks in a privately owned metered parking lot. He does not purchase a ticket from the meter. Les returns to his vehicle to find a parking ticket from the parking company on his windshield. Les throws the ticket away, but in a few weeks receives another ticket in the mail. The parking company used Les' licence plate number to obtain his name and address.

- Parking companies should have access to names and addresses in order to contact parking violators (please circle)

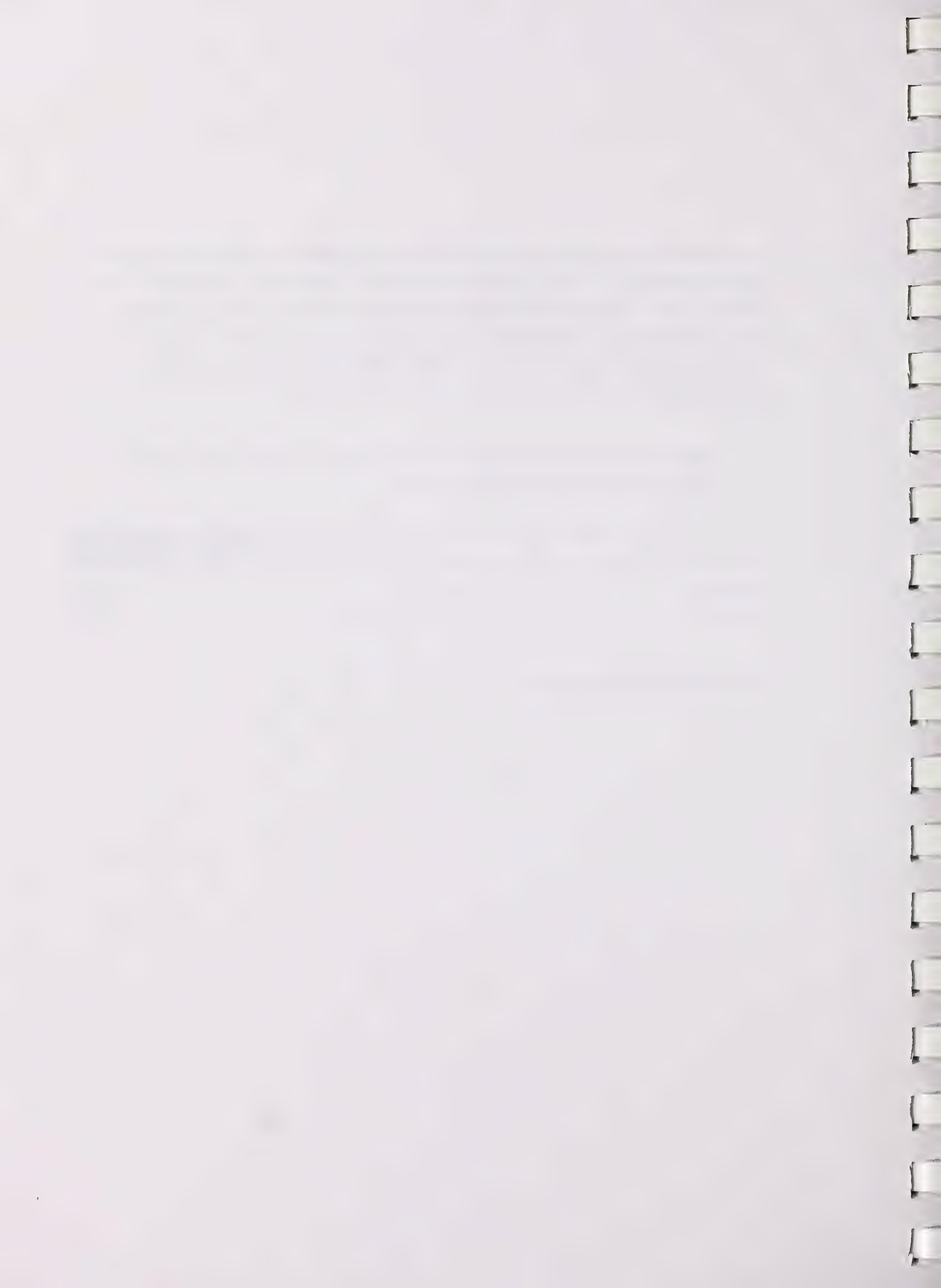
1	2	3	4	5	6	7
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Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?



- B. If Les doesn't pay his ticket, the parking company should pass his name and address onto a debt collection company.

1	2	3	4	5	6	7
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Strongly  
disagree

Neutral

Strongly  
agree

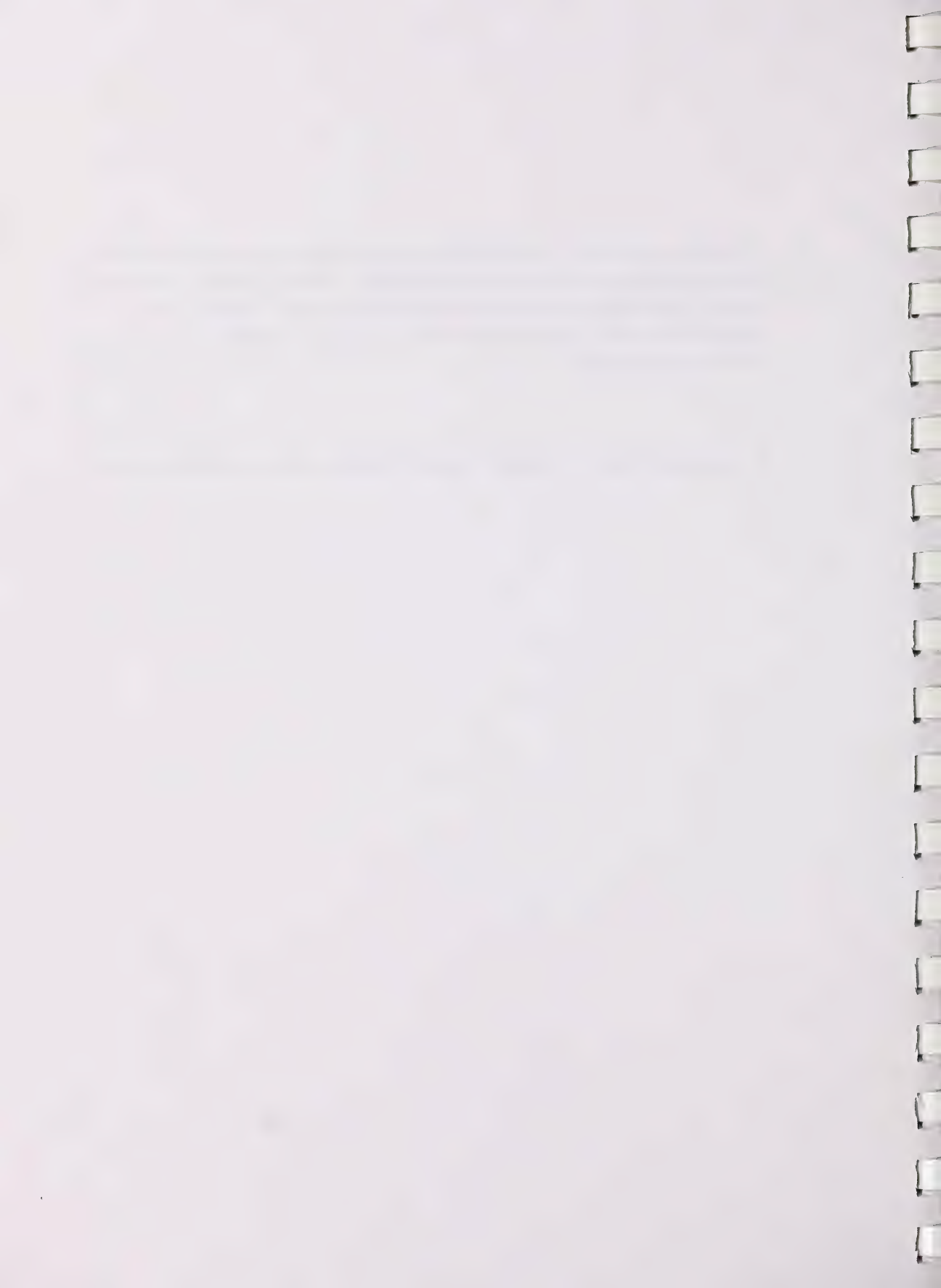
Why do you feel this way?





- C. If parking companies were not able to obtain names and addresses from licence plate records, they could tow illegally parked vehicles. Les would then be responsible for paying for the towing charges. Should Les' vehicle be towed, or should he receive a ticket in the mail from a collection company?

If Les doesn't pay the original ticket, what should the parking company do?



Joanne buys a brand new car. She phones her insurance company to get insurance on her new vehicle. She has 2 children (ages 17, 20) who live with her and the insurance company tells her that she must obtain signed statements of consent for the insurance company to access her children's driver's abstracts. Joanne wants to drive her car immediately, but she is told that the insurance company must have driver's abstracts for all parties who might be driving her vehicle.

Insurance companies should have informed consent from individuals prior to obtaining driver's abstracts.

1	2	3	4	5	6	7
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Strongly  
disagree

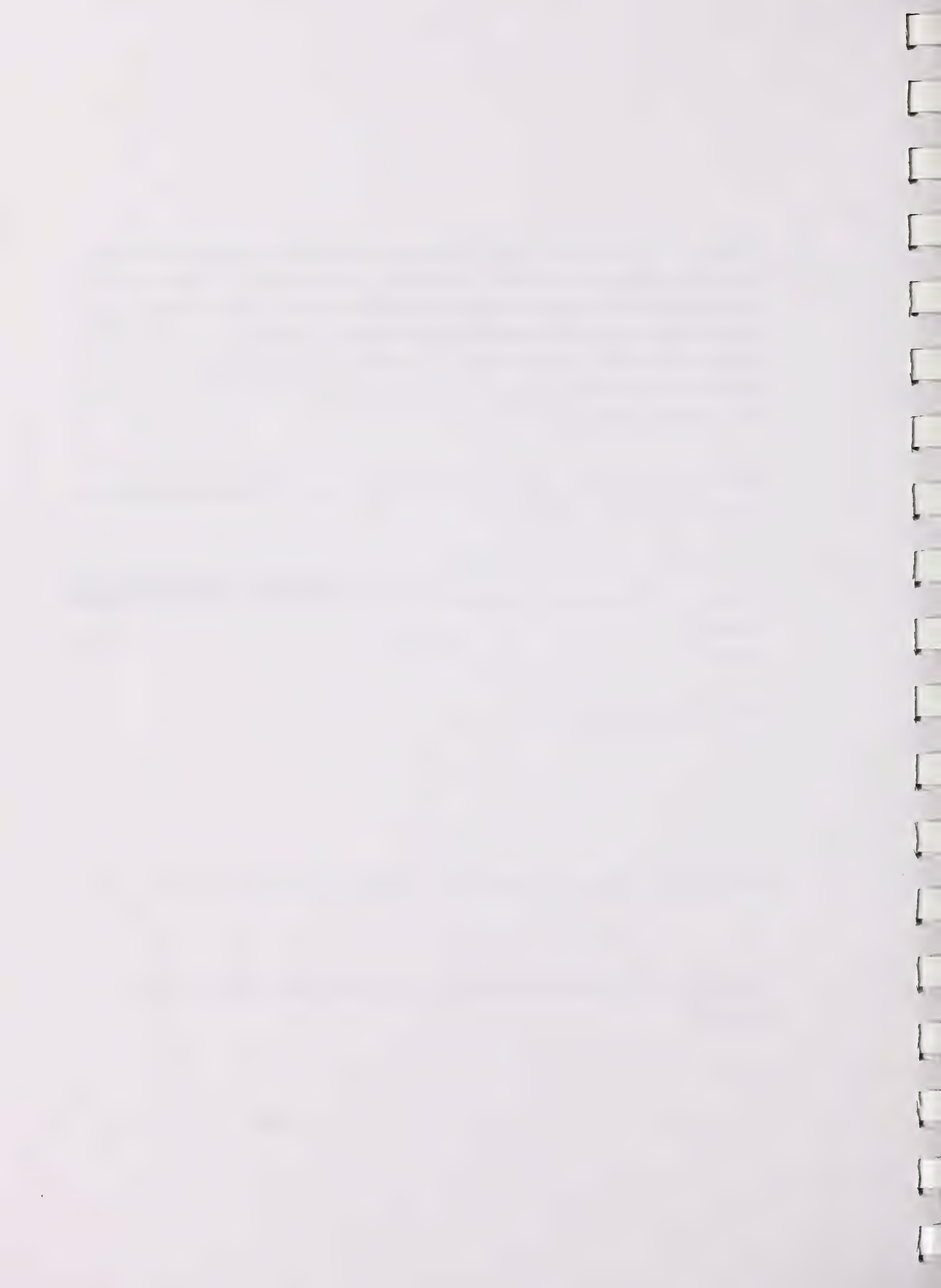
Neutral

Strongly  
agree

Why do you feel this way?

When should insurance companies be allowed to pull driver's abstracts?

When should insurance companies be prohibited from pulling driver's abstracts?



Jackie writes a number of bad cheques for purchases made at several small businesses throughout the city. The address and phone number on Jackie's cheques are incorrect, and there is no new listing for her in the telephone book. Jackie used a driver's licence as identification when writing the cheques. Unable to contact Jackie, one small business contacts a debt collection company, and provides them with Jackie's returned cheques. The debt collection company uses Jackie's driver's licence number to find her current address and then sends her a notice of collection.

The debt collection company should be able to use Jackie's driver's licence information to find her proper address.

1	2	3	4	5	6	7
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Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?

A private individual trying to collect on a debt should have access to Jackie's name and address to serve her with court papers.

1	2	3	4	5	6	7
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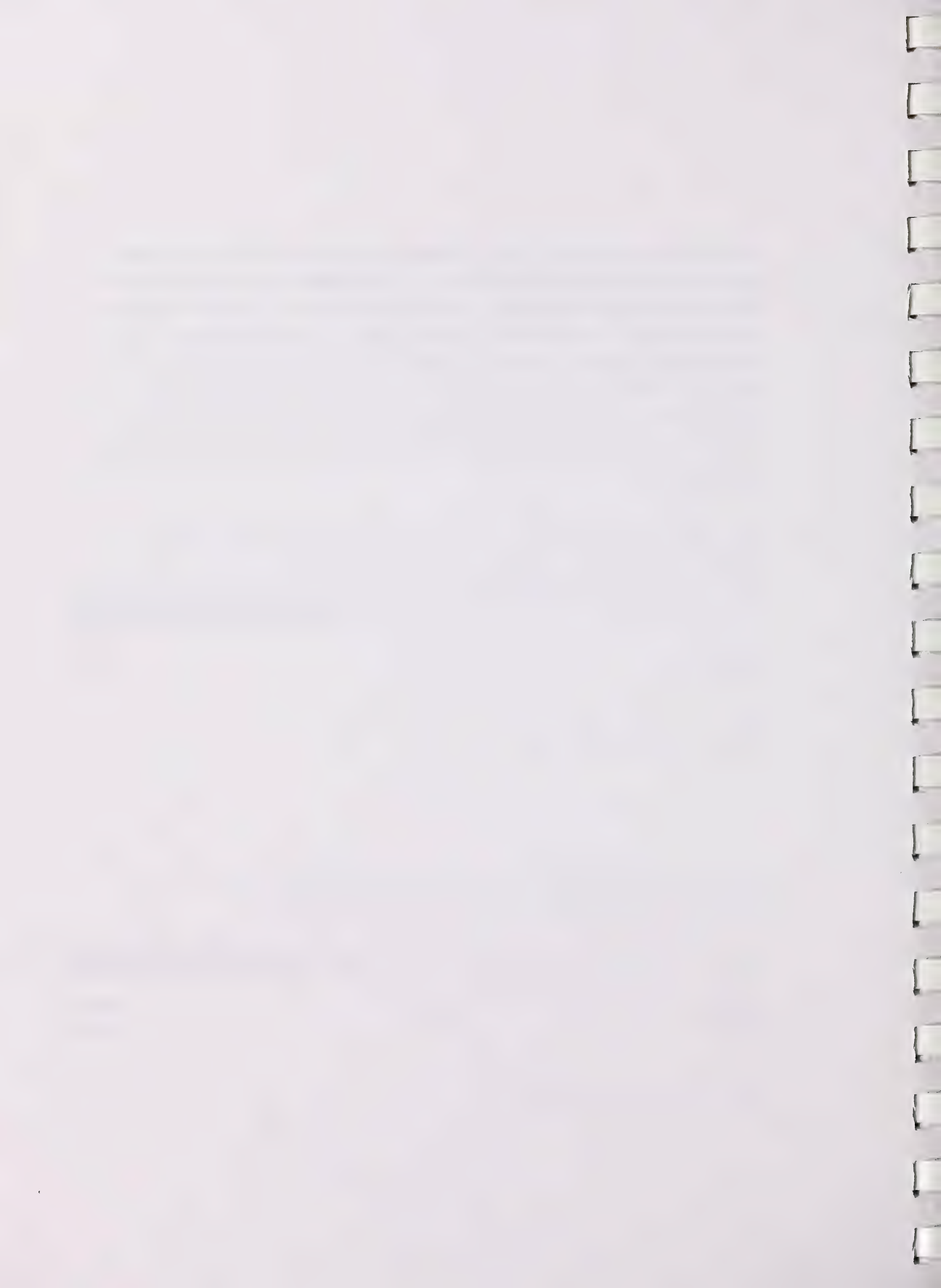
Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?





Lisa has insurance with GroupZ insurance company. She was in an car accident with another GroupZ client and claims that she can not return to work as a shipper, since her injuries don't allow her to lift heavy objects. Lisa's insurance file has a number of suspect claims against it, and the insurance company thinks that Lisa may be misrepresenting her injuries. GroupZ hires a private investigator to determine if Lisa is actually unable to return to work. The private investigator uses the insurance company's information to find Lisa's address, as well as her driver's licence number to obtain a physical description. The investigator sees Lisa doing yard work, much of which requires heavy lifting. The investigator reports his findings to the insurance agency for follow-up.

Private investigators should have the ability to access names, addresses and physical descriptions from drivers' licence records when investigating individuals.

1	2	3	4	5	6	7
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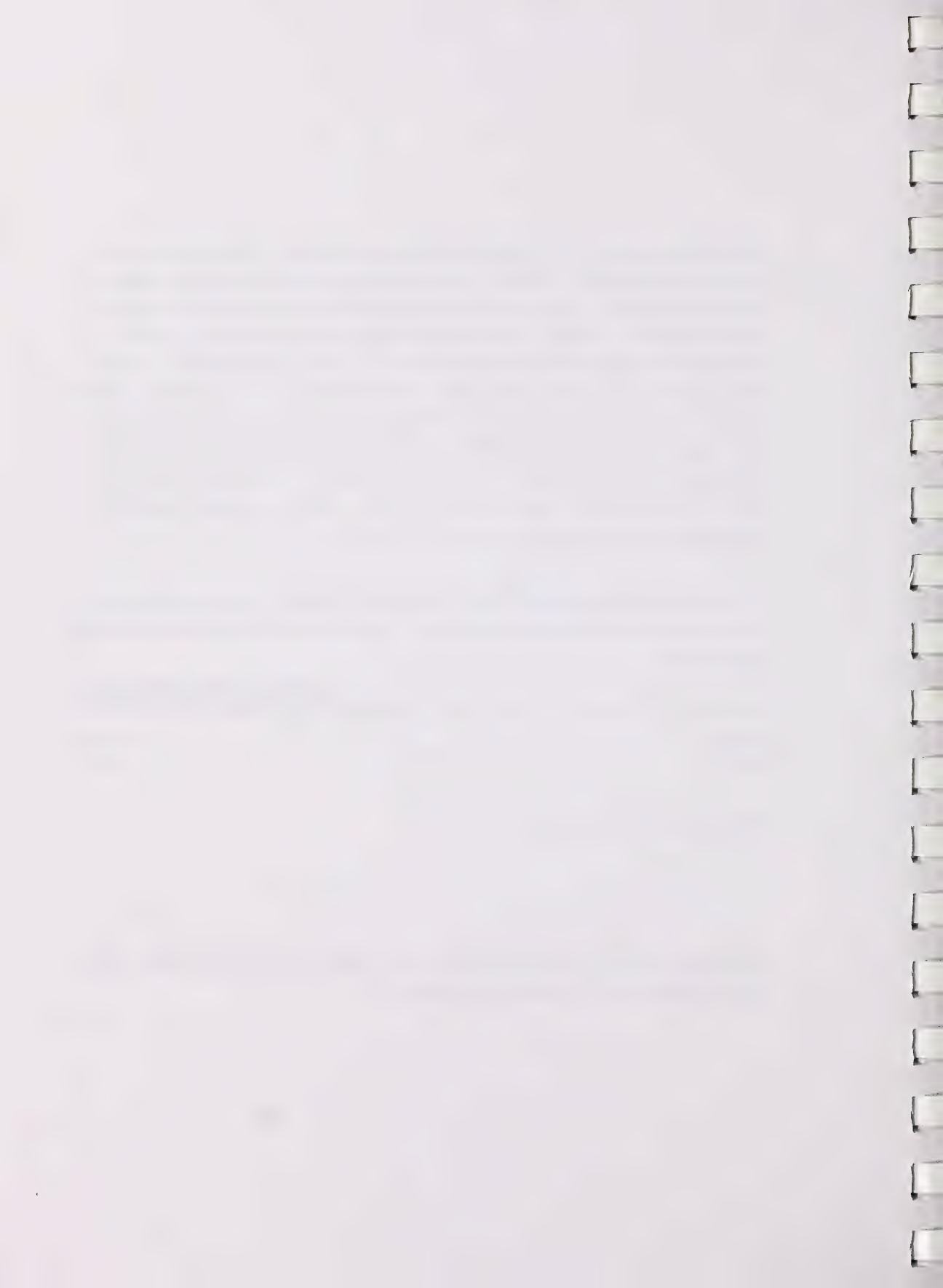
Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?

In what circumstances should private investigators be able to obtain this type of personal information on someone?



Richard is a corporate security officer for Transoil company. Company executives feel that one of their employees is embezzling funds from Transoil. Richard reviews the employee's file and notes that the employee makes \$35,000/year. He then checks the employee's vehicle information and finds that the employee (who is single) owns a number of expensive cars, including a Mercedes convertible. Richard feels that the number of vehicles owned by the employee supports the executives' claims of embezzlement, and reports his findings to them. They in turn hand the file over to the police for further investigation.

During pre-investigative work, corporate security personnel should have access to vehicle ownership information.

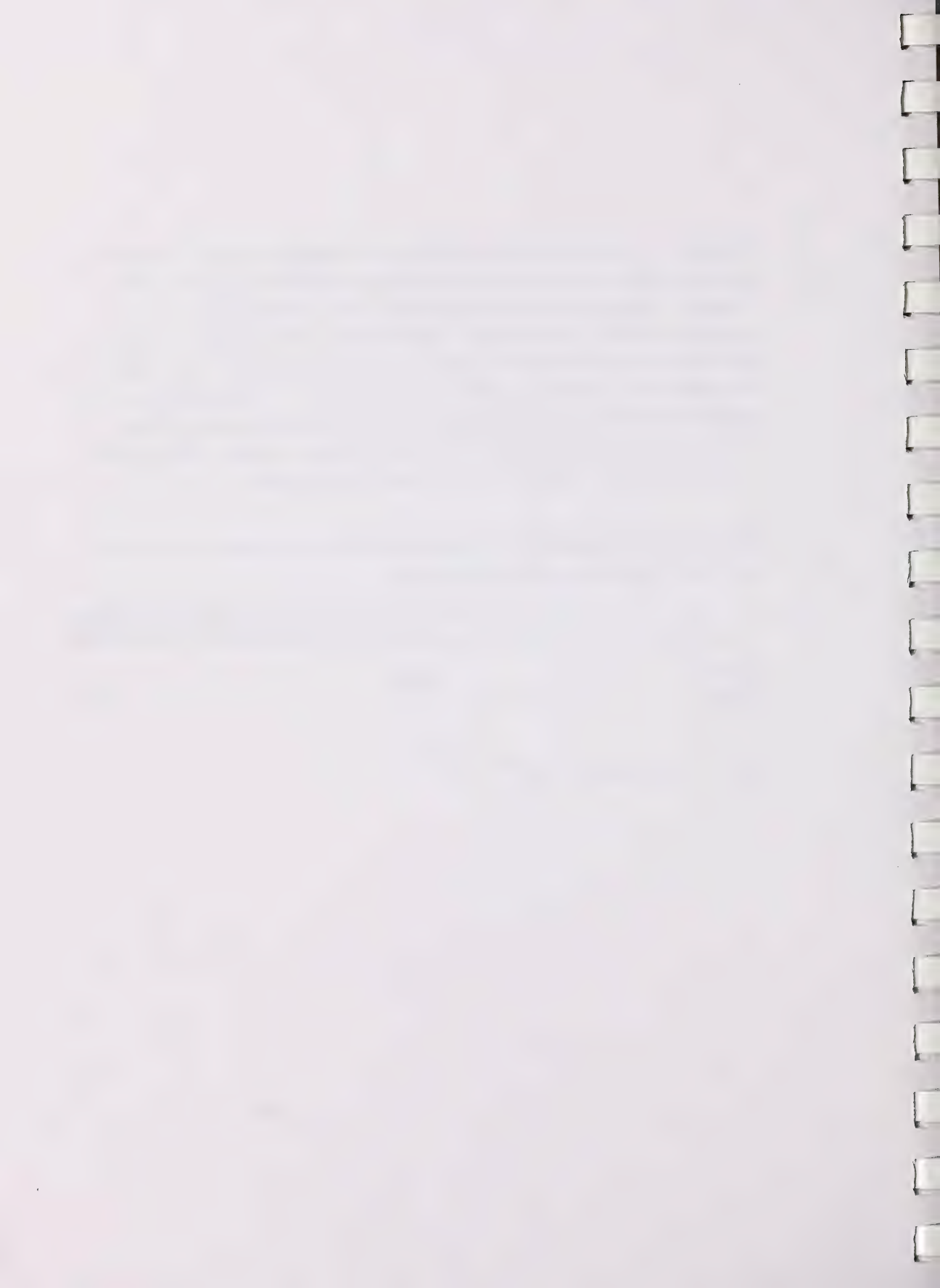
1	2	3	4	5	6	7
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Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?



Jenny is divorcing her husband Richard. Her lawyer feels that Jenny deserves half of Richard's assets. The lawyer searches motor vehicle ownership records and sees that Richard has joint ownership of 2 cars under another woman's name. The lawyer feels that Jenny may have some legal rights to these assets, and includes these assets in the file.

Lawyers should have access to information such as vehicle ownership and registration.

1	2	3	4	5	6	7
---	---	---	---	---	---	---

Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?

If Jenny's lawyer needed Richard's new address (which Jenny doesn't have) to serve him with court documents, her lawyer should be able to use driver information or vehicle records to find him?

1	2	3	4	5	6	7
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Strongly  
disagree

Neutral

Strongly  
agree

Why do you feel this way?





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## **APPENDIX C**

# **Financial Impact Questionnaire**





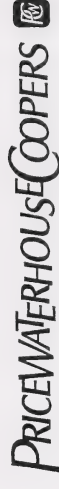
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## *Registry Agent - Financial Impact Questionnaire*

Moving Forward - Your invitation to identify the financial impact associated with the implementation of the Privacy Commissioner's and Auditor General's recommendations on Alberta Registry Agents.

August 1998

This material is intended for PricewaterhouseCoopers. The material contains information that is privileged, confidential and is not intended for disclosure. Any review, dissemination or use of this material by persons other than PricewaterhouseCoopers is strictly prohibited.





## Questionnaire Instructions

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Please complete the questionnaire after you have reviewed the *Registry Agent - Financial Impact Workbook* (printed on green paper). Respond to each question by circling the choice that best approximates the answer or if provided, fill in the blanks. If you do not know the answer to a question please circle "do not know". We understand that you may not have access to reports which will give you the answers to the questions. In these cases, please provide us with your best estimate. For questions which ask for annual information, please use the 1997 calendar year as your base or indicate what time frame you based your response on.

Once completed, return the questionnaire in the postage paid envelope enclosed. If you have any questions or concerns please contact Monty Balderston of PricewaterhouseCoopers at:

### PricewaterhouseCoopers

1501 Toronto Dominion Tower

Edmonton Centre

Edmonton, Alberta T5J 2Z1


Attn: Monty R. Balderston, CA

Fax: (403) 493 - 8272

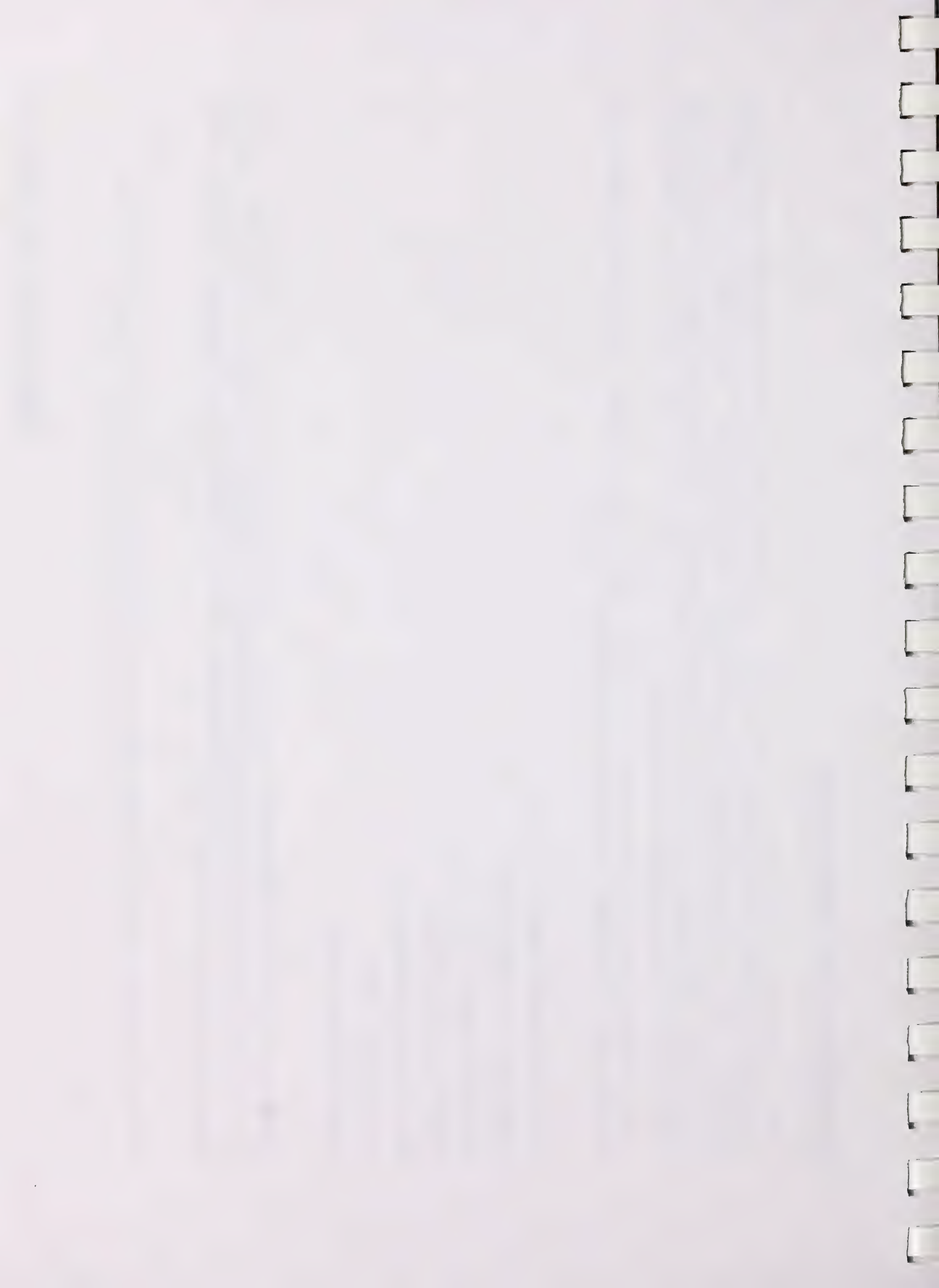
Phone: (403) 493 - 8213

Thank you, in advance, for completing the questionnaire. Your responses, combined with other consultation activities being conducted will provide valuable insight into the impact of the Freedom of Information and Protection of Privacy Act on your business. **Your individual responses are strictly confidential**, as only aggregate information will be shared with the Minister of Municipal Affairs.

We would appreciate if you would complete and return the questionnaire by no later than **September 18, 1998**.

PRICEWATERHOUSECOOPERS 





# Questionnaire

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As many of the Registry Agents are unique, mainly due to the client base they serve, we would appreciate if you would complete the following so that we can aggregate the results based on client base (i.e. large municipalities versus towns). In addition, please provide a contact name and number so that we can contact you, if need be, at a later date to clarify responses provided.

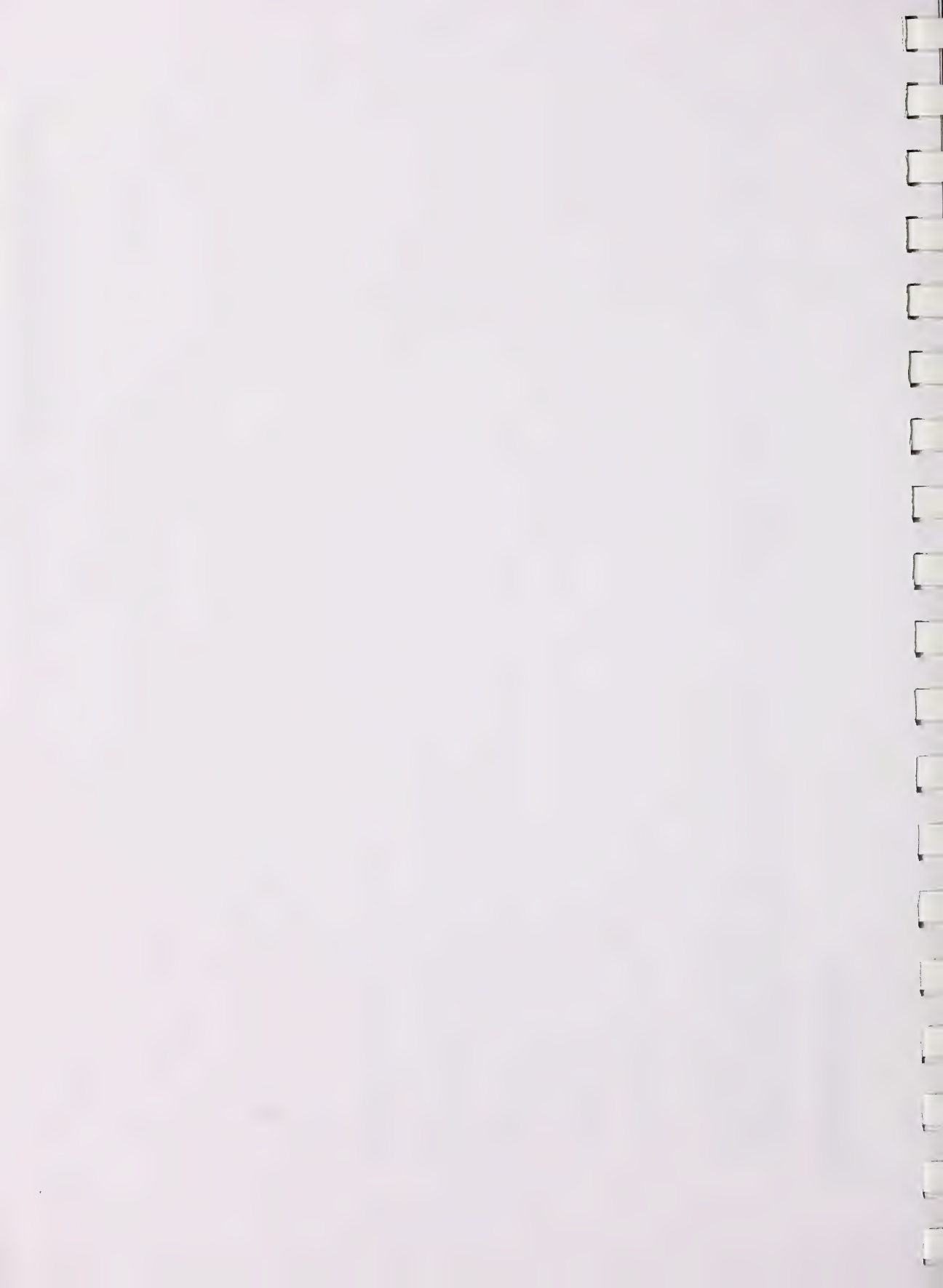
Agent Name: \_\_\_\_\_.

Address: \_\_\_\_\_.

City/Town: \_\_\_\_\_.

Contact Name: \_\_\_\_\_.

Contact Phone No.: \_\_\_\_\_.



## Questionnaire

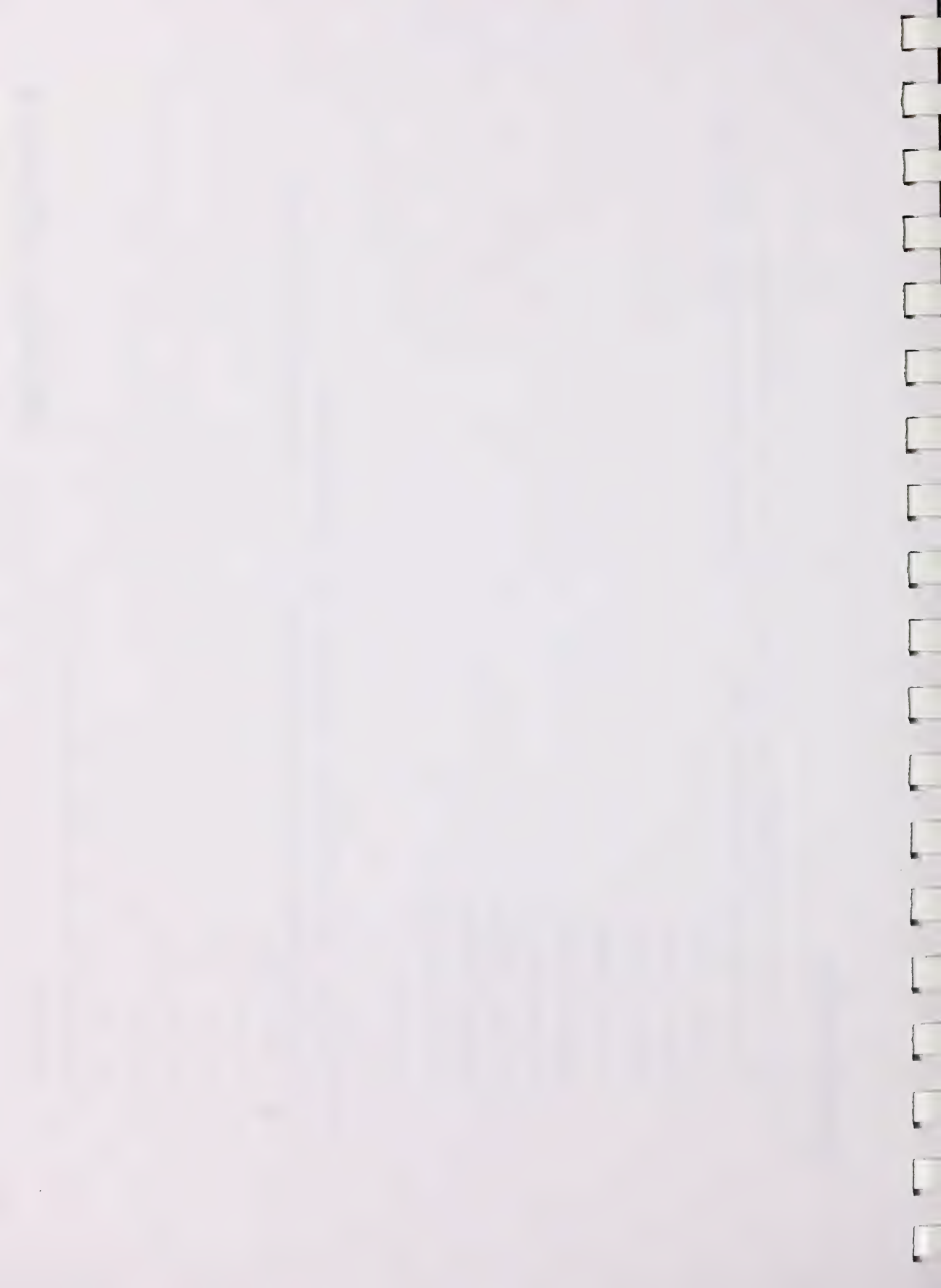
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1. On average, what is your total Registry Agent revenues, net of fees distributed to Alberta Registries?

- Enter the total Registry Agent revenues here \_\_\_\_\_ or alternatively circle the appropriate response below.
- Less than \$5,000
- \$5,000 - \$10,000
- \$10,000 - \$20,000
- \$20,000 - \$40,000
- \$40,000 - \$70,000
- \$70,000 - \$100,000
- \$100,000 - \$150,000
- \$150,000 - \$200,000
- In excess of \$200,000
- Do not know

2. What percentage of your Registry Agent net revenue comes from **MOVES** searches?

- Enter the percentage of Registry Agent revenue here \_\_\_\_\_ or alternatively circle the appropriate response below.
- 0% - 2%
- 2% - 4%
- 4% - 6%
- 6% - 8%
- 8% - 10%
- In excess of 10% (please estimate percentage \_\_\_\_\_)
- Do not know



# Questionnaire

3. How many **MOVES** searches, **on average**, does your agency conduct annually?

- Enter the number of searches here \_\_\_\_\_ or alternatively circle the appropriate response below.
- 0 - 100
- 100 - 500
- 500 - 1,000
- 1,000 - 2,000
- 2,000 - 5,000
- 5,000 - 10,000
- In excess of 10,000
- Do not know

4. Based on your response to question 3, what percentage of your **total MOVES** searches does each of the following report types represent? (i.e. I sell 100 searches/year, I sell 10 demographic searches, therefore 10% of all my searches are demographic)

- Demographic (includes Name, address, date of birth, physical description and gender) \_\_\_\_\_ %
- Operator (includes licence number, name, date of birth, class of licence, condition codes) \_\_\_\_\_ %
- Vehicle Registration (includes registration expiry date, vehicle registration address) \_\_\_\_\_ %
- Related Vehicle (includes serial numbers, years and makes of vehicles, expiry date of registration, joint client MVID) \_\_\_\_\_ %
- Other (please specify) \_\_\_\_\_
- Do not know





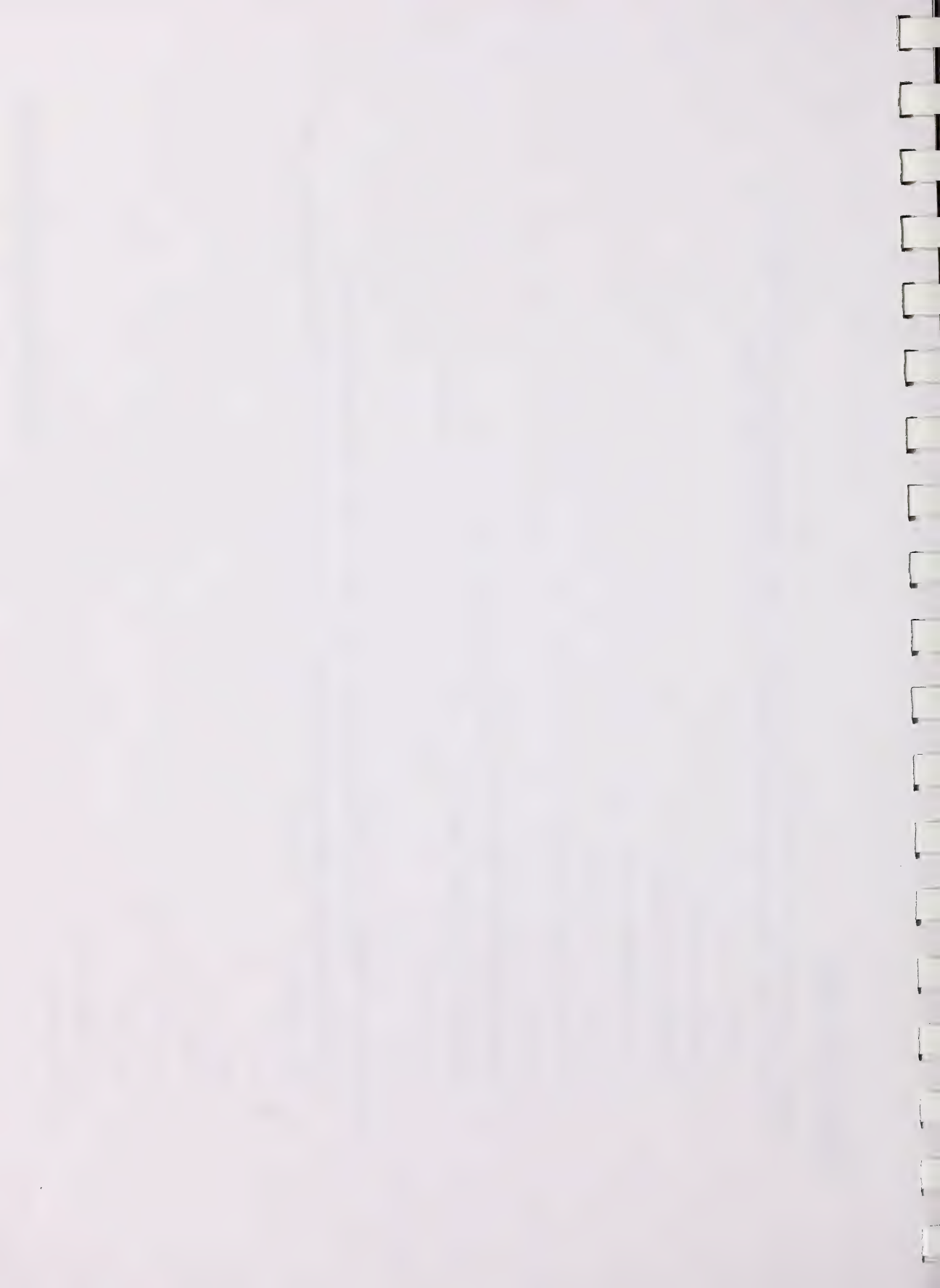
## Questionnaire

5. Who is currently requesting **MOVES** searches? Please indicate the percent of your total **MOVES** searches requested by each customer group (please estimate if you don't know exact percentages).

- Lawyers \_\_\_\_\_ %
- Private investigators \_\_\_\_\_ %
- Debt collection agencies \_\_\_\_\_ %
- Civil enforcement agencies \_\_\_\_\_ %
- Parking \_\_\_\_\_ %
- Post-adoption search agencies \_\_\_\_\_ %
- Insurance \_\_\_\_\_ %
- Individuals requesting their own information \_\_\_\_\_ %
- Other (please specify who and %) \_\_\_\_\_
- Do not know

6. How much, **on average**, do you charge as a service fee to your customers for a **MOVES** search?

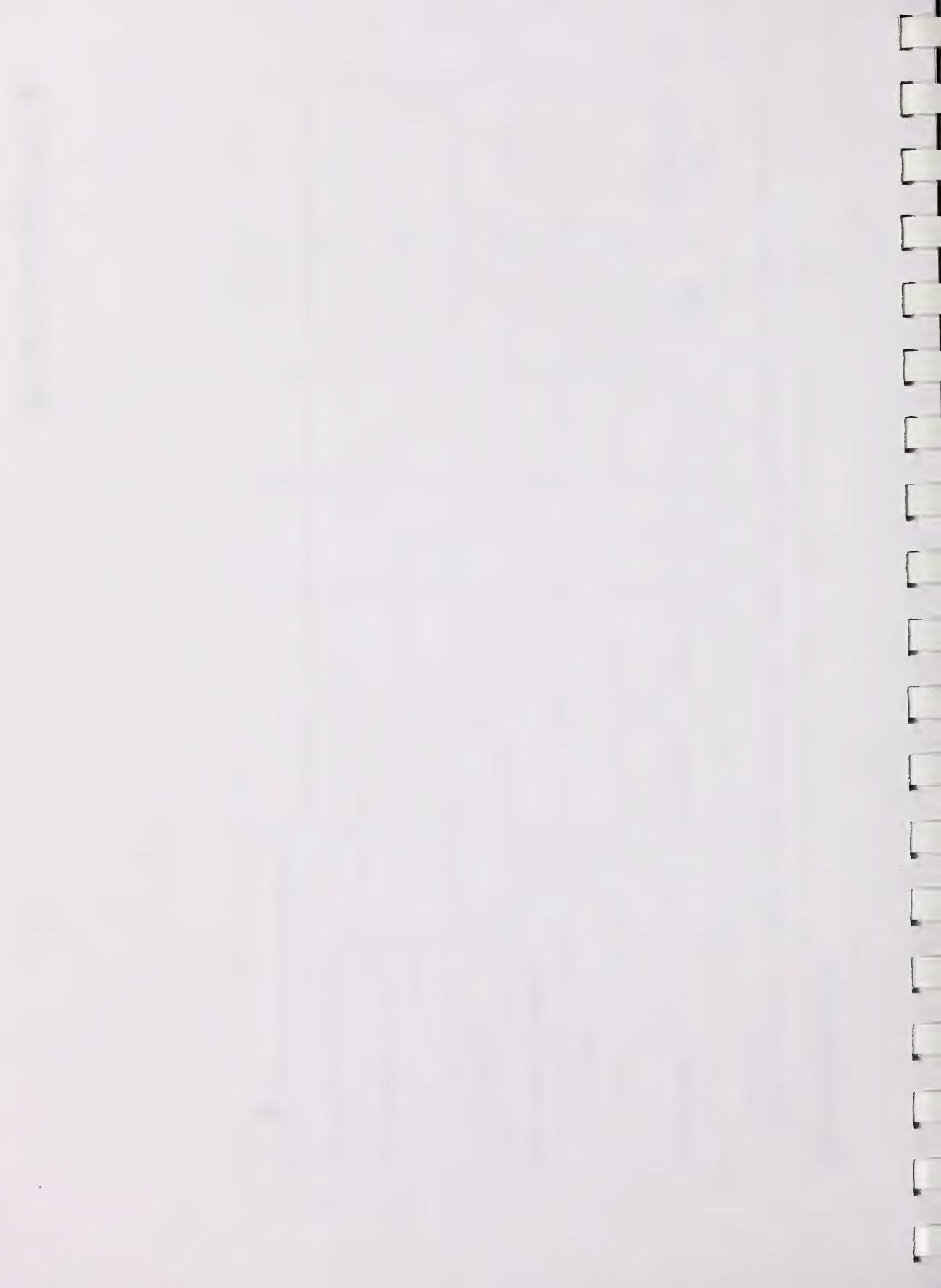
- Enter the average fee charged per search here \_\_\_\_\_ or alternatively circle the appropriate response below.
- Less than \$2
- \$2 - \$4
- \$4 - \$6
- \$6 - \$8
- \$8 - \$10
- \$10 - \$12
- In excess of \$12
- Do not know



# Questionnaire

7. Please identify by checking the appropriate box, which customers are purchasing each type of **MOVES** search report or abstract:

Customer	Demographic	Operator	Drivers Abstract	Vehicle Registration	Related Vehicle	Other (please specify)
Insurance						
Collection Agencies						
Civil Enforcement Agencies						
Private investigators						
Lawyers						
Private parking companies						
Post-Adoption search agencies						
Individuals (requesting their own information)						



# Questionnaire

8. Based on the anticipated changes outlined in the *Registry Agent - Financial Impact Workbook* (printed on green paper), which of YOUR customers will be most affected in terms of access to Motor Vehicle information? Please list the top 3 (ie. Lawyers, private investigators, insurance)
- \_\_\_\_\_ (a) see question 7.
  - \_\_\_\_\_ (b) see question 7.
  - \_\_\_\_\_ (c) see question 7.
9. Based on the anticipated changes to your top 3 customers (identified in question 8), what will be the financial impact on your Agency? For example, if you currently sell approximately 500 searches/yr at \$5 each to private investigators, the financial impact on your Agency could be \$2500/yr for this customer group.
- The financial impact from \_\_\_\_\_ (listed in question 8a) customer will be approximately \$ \_\_\_\_\_/year.  
My agency sells approximately \_\_\_\_\_ searches/year to this customer group.
  - The financial impact from \_\_\_\_\_ (listed in question 8b) customer will be approximately \$ \_\_\_\_\_/year.  
My agency sells approximately \_\_\_\_\_ searches/year to this customer group.
  - The financial impact from \_\_\_\_\_ (listed in question 8c) customer will be approximately \$ \_\_\_\_\_/year.  
My agency sells approximately \_\_\_\_\_ searches/year to this customer group.





## Questionnaire

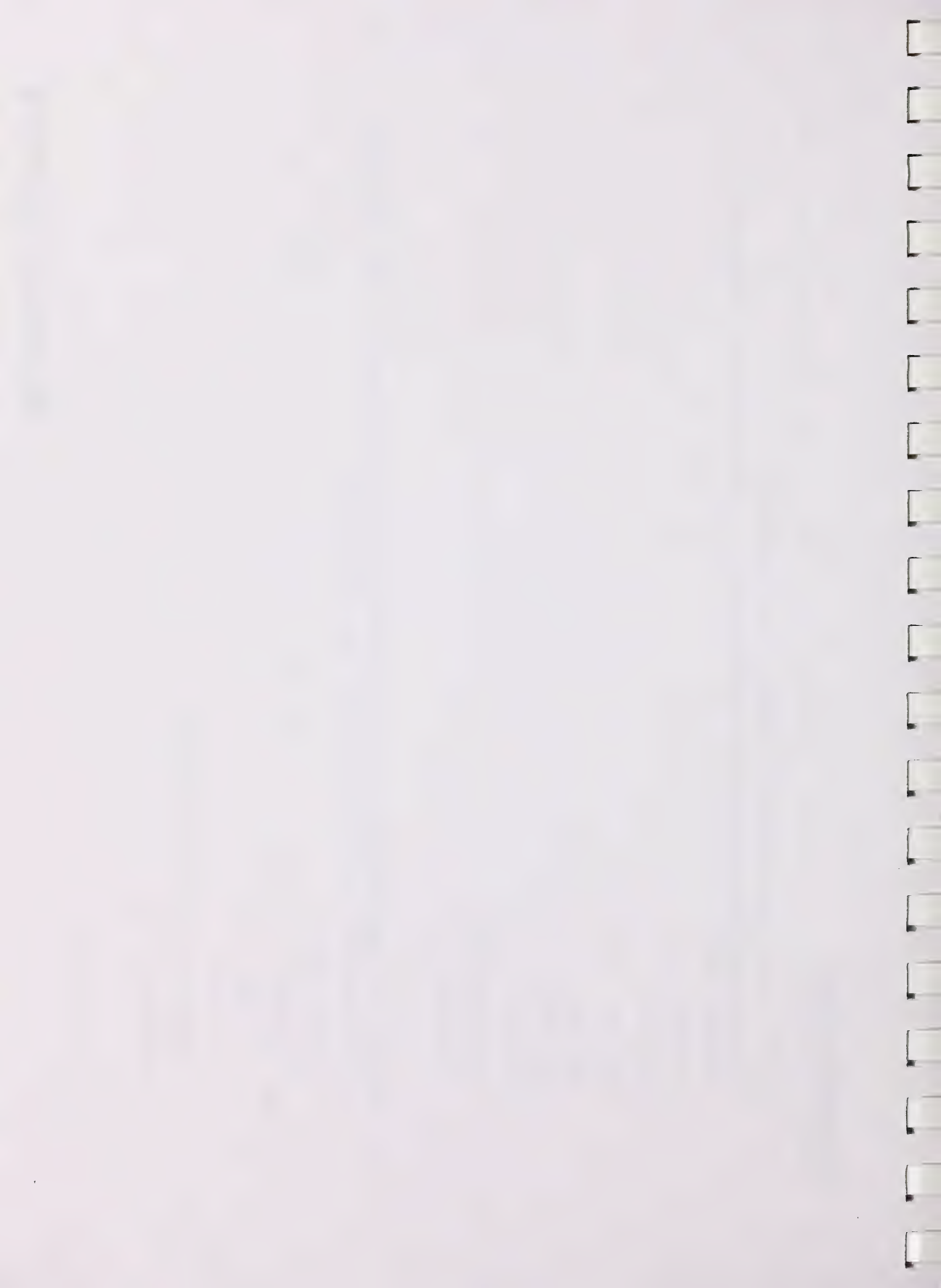
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10. How much does your agency charge, **on average**, for a drivers abstract?

- Enter the average fee charged per drivers abstract here \_\_\_\_\_ or alternatively circle the appropriate response below.
- Less than \$2
- \$2 - \$4
- \$4 - \$6
- \$6 - \$8
- \$8 - \$10
- \$10 - \$12
- In excess of \$12
- Do not know

11. How long do you think it will take to train your staff members on the anticipated standards (i.e. How to determine if informed consent has been obtained)? (Circle the appropriate response)

- Less than 1hour
- 1 to 3 hours
- 3 to 5 hours
- 5 to 7 hours
- In excess of 7 hours (estimate time here \_\_\_\_\_)
- Do not know



# Questionnaire

12. Based on the anticipated standards outlined in the Registry Agent - Financial Impact Workbook (printed on green paper), how much additional time, on average, do you think it will take your employees to review, evaluate and file documentation in relation to processing a MOVES search transaction (i.e. Review and evaluate documentation to determine if informed consent has been obtained and to file the necessary documents to support that informed consent was obtained)? (Circle the appropriate response)
- 0 - 1 minute
  - 1 - 3 minutes
  - 3 - 5 minutes
  - 5 - 7 minutes
  - 7 - 10 minutes
  - In excess of 10 minutes
  - Do not know
13. What is your average annual salary per front line staff member (i.e. Staff that deal directly with customers)?
- Enter the average annual salary here \_\_\_\_\_.
14. What is the standard number of hours per week for your salary employees?
- Enter the number of hours per week here \_\_\_\_\_.
15. What is your average hourly wage per front line staff member (i.e. Staff that deal directly with customers)?
- Enter the average hourly wage here \_\_\_\_\_.



# Questionnaire

16. Based on the anticipated standards outlined in the *Registry Agent - Financial Impact Workbook* (printed on green paper) , how much additional time, **on average**, will it take your employees to file documentation in relation to processing a drivers abstract? (Circle the appropriate response)

- 0 - 1 minute
- 1 - 3 minutes
- 3 - 5 minutes
- In excess of 5 minutes
- Do not know

17. Currently, does your agency store (at the end of the day) all **motor vehicle documents with personal identifiers** in locked filing cabinets or the equivalent? (Circle the appropriate response)

- Yes (Please go to question 19)
- No (Please go to question 18)
- Do not know (Please go to question 18)

18. Please skip this question if you answered 'yes' to question 17. What do you estimate the cost to be to store **all motor vehicle documents with personal identifiers** in locked filing cabinets or the equivalent?

- Enter the estimate here \_\_\_\_\_ and describe what this would include below.

➤ This would include: \_\_\_\_\_

- Do not know \_\_\_\_\_





# Questionnaire

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19. Currently, does your agency store any **motor vehicle documents with personal identifiers** off-site? (Circle the appropriate response)
- Yes (Please go to question 20)
  - No (Please go to question 23)
  - Do not know (Please go to question 23)
20. Please skip this question if you answered 'no' to question 19. Is the off-site location adequately secured to prevent unauthorized access to the **motor vehicle documents with personal identifiers**? (Circle the appropriate response)
- Yes (Please go to question 22)
  - No (Please go to question 21)
  - Do not know (Please go to question 21)
21. Please skip this question if you answered 'yes' to question 20. What do you estimate it would cost to ensure that the documents stored off-site are adequately secured to prevent unauthorized access to the **motor vehicle documents with personal identifiers**?
- Enter the estimate here \_\_\_\_\_ and describe what this would include below.
  - Do not know
22. Please skip this question if you answered 'no' to question 19. How much time on an annual basis do you estimate it will take to maintain a list of **motor vehicle documents with personal identifiers** that are stored off-site?
- Enter time here \_\_\_\_\_.
  - Do not know



# Questionnaire

23. How long does it take, on average, to log off and re-log onto **MOVES**? (Circle the appropriate response)
  - 0 - 1 minute
  - 1 - 3 minutes
  - 3 - 5 minutes
  - in excess of 5 minutes
  - Do not know
  
24. Do you currently have more than one employee using the same computer terminal and ID while serving customers? (Circle the appropriate response)
  - Yes (Please go to question 25)
  - No (Please go to question 27)
  - Do not know (Please go to question 25)
  
25. Please skip this question if you answered 'no' to question 24. How many additional computer terminals do you think it will require to have each employee effectively serving your customers using separate ID's?
  - Please enter the number of computer terminals here \_\_\_\_\_.
  - Do not know



## Questionnaire

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26. Please skip this question if you answered 'no' to question 24. What would it cost you to purchase one computer terminal?
- > Please enter the cost of one computer terminal here \_\_\_\_\_.
  - > Do not know
27. What is your average employee turn over on an annual basis?
- > Enter the number of employees on an annual basis here \_\_\_\_\_.
  - > Do not know
28. How much would you estimate it would cost to change the locks at your agency premises?
- > Enter the amount it would cost to change the locks at your agency here \_\_\_\_\_.
  - > Do not know
29. What do you estimate the cost to be to change the safe at your agency premises to one which fits the criteria in the recommendations (recommendations suggest that safe has to have the ability to change the combination)?
- > Enter the amount it would cost to change the safe at your agency here \_\_\_\_\_.
  - > Do not have a safe
  - > Do not know





## Questionnaire

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30. What percentage of your total Registry Agent revenue do you think will be lost due to the recommendations? Please explain below. If you require additional space, use a separate piece of paper and clearly identify the question being discussed.
31. Are there any other issues that you feel we have not addressed in this questionnaire that you would like us to consider? Please explain in the space provided below. If you require additional space, use a separate piece of paper and clearly identify the question being discussed.



## Questionnaire - Fees for Services

Recently, Alberta Registries reduced the government fee for filing annual returns from \$20 to \$10. Alberta Registries would like to determine what affect, if any, this rollback has had on the fee charged to the customer. In addition, Alberta Registries would also like to determine the fee charged for processing incorporations, name changes, capital changes with a restatement, trade name and partnership registrations, and address/director changes. In this regard, the following questions addresses this specific issue. Your individual response will be kept strictly confidential, as only aggregate results will be shared with the Minister of Municipal Affairs.

32. When the government rolled back the fee for filing annual returns, how much did you reduce your fee?  
 > Enter the amount here \_\_\_\_\_.

33. How much do you charge for the following services?

Type of Service	Consumer	Account Holder
Annual return		
Incorporation		
Company name change		
Capital change with a restatement		
Trade name or partnership registration		
Address/director changes		



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## **APPENDIX D**

# **Financial Impact Workbook**





## *Registry Agent - Financial Impact Workbook*

Moving Forward - Your invitation to identify the financial impact associated with the implementation of the Privacy Commissioner's and Auditor General's recommendations on Alberta Registry Agents.

August 1998

This material is intended for PricewaterhouseCoopers. The material contains information that is privileged, confidential and is not intended for disclosure. Any review, dissemination or use of this material by persons other than PricewaterhouseCoopers is strictly prohibited.



# Introduction

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Alberta Registries has a responsibility to collect and retain information in the Motor Vehicles Registry. To address this responsibility, Alberta Registries asked for an audit by both Alberta's Privacy Commissioner and the Auditor General. Their report pointed to some issues on how information is collected and shared. It recommends a number of steps to protect the privacy of information in the Motor Vehicles registry. Before Alberta Registries takes action on the recommendations, it wants to fully assess the implications of these recommendations.

Alberta Registries has engaged PricewaterhouseCoopers to undertake a consultation process with Registry Agents to determine the financial impact associated with the implementation of the recommendations<sup>1</sup>. **Preliminary workshops have attempted to determine a general impact for some of the recommendations. This workbook specifically deals with the financial implications of the Privacy Commissioner and Auditor General's report on Registry Agents.**

Individual Registry Agent results from this workbook will be kept **confidential** by PricewaterhouseCoopers, however the aggregate results will be presented to the Minister of Municipal Affairs. Based on the results of the consultation process, new policies and standards will be developed. Upon conclusion of the project, completed questionnaires will be kept confidential and retained by PricewaterhouseCoopers in accordance with our standard file documentation and retention policies and practices.

<sup>1</sup> PricewaterhouseCoopers is an independent firm that has been retained to coordinate the consultations and compile stakeholder feedback.



## Background

Results of an Audit of the Motor Vehicles Registry, jointly conducted by the Privacy Commissioner and the Auditor General, were released on April 22, 1998 by Iris Evans, Minister of Municipal Affairs. The Audit identified 21 recommendations. The Minister accepted these recommendations in principle, many of which deal with management controls and information systems. However, the Minister wants to assess the financial impact prior to implementing the recommendations.

Preliminary workshops, which included Registry Agents and users of the Motor Vehicle information, helped PricewaterhouseCoopers to understand how the data from the Motor Vehicle database (MOVES) is currently being utilized. In addition, Public Research will be performed to understand the public reaction to these recommendations. The *Registry Agent - Financial Impact Workbook* is specifically designed to identify the financial impact of the recommendations for the Registry Agents.

### Key Recommendations

Of the 21 recommendations the following are believed to have a financial impact on Registry Agents:

- 1. In order to protect the personal information of Albertans from inappropriate disclosure and consequent misuse, it is recommended that the Minister responsible for Alberta Registries consider the advisability of making personal information in the Office of the Registrar of Motor Vehicles Services fully subject to Part 2 of the Freedom of Information and Protection of Privacy Act. Alternatively, it is recommended that Alberta Registries consider adopting fair information practices that are equivalent to the Freedom of Information and Protection of Privacy Act with respect to the use, disclosure and protection of personal information in the Motor Vehicles Registry. (Recommendation #7 provides more detail)





## Background

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- 2. In order to comply with the collective provisions of the Freedom of Information and Protection of Privacy Act, it is recommended that Alberta Registries ensure that private registry agents discontinue recording personal information provided by applicants to establish their identity.
- 7. While we recognize that the use and disclosure of personal information in the Office of the Registrar of Motor Vehicles is not subject to the Freedom of Information and Protection of Privacy Act, we believe that Albertans expect that the protection of privacy provisions should apply to the use and disclosure of registry information.  
It is recommended that Alberta Registries adopt fair information practices and disclose personal information only:
  - if the disclosure is consistent with the original purpose for which the information was collected; or
  - if there is legislative authority for disclosure; or
  - if informed consent has been obtained; or
  - if disclosure is for a purpose consistent with the provisions of sections 38, 40 and 41 of the Freedom of Information and Protection of Privacy Act, which specifies the circumstances under which a public body may disclose personal information.
- 8. It is recommended that Alberta Registries monitor the disclosure of driver abstracts to ensure consent is obtained in compliance with the Motor Vehicles legislation.
- 9. It is recommended that Alberta Registries ensure that the personal information disclosed to clients is used in accordance with the terms of the access agreements between Alberta Registries and those clients.
- 10. In order to ensure that access to the Motor Vehicles Registry is restricted uniformly, it is recommended that Alberta Registries establish standards and conditions for granting access privileges and regularly update its records.





## Background

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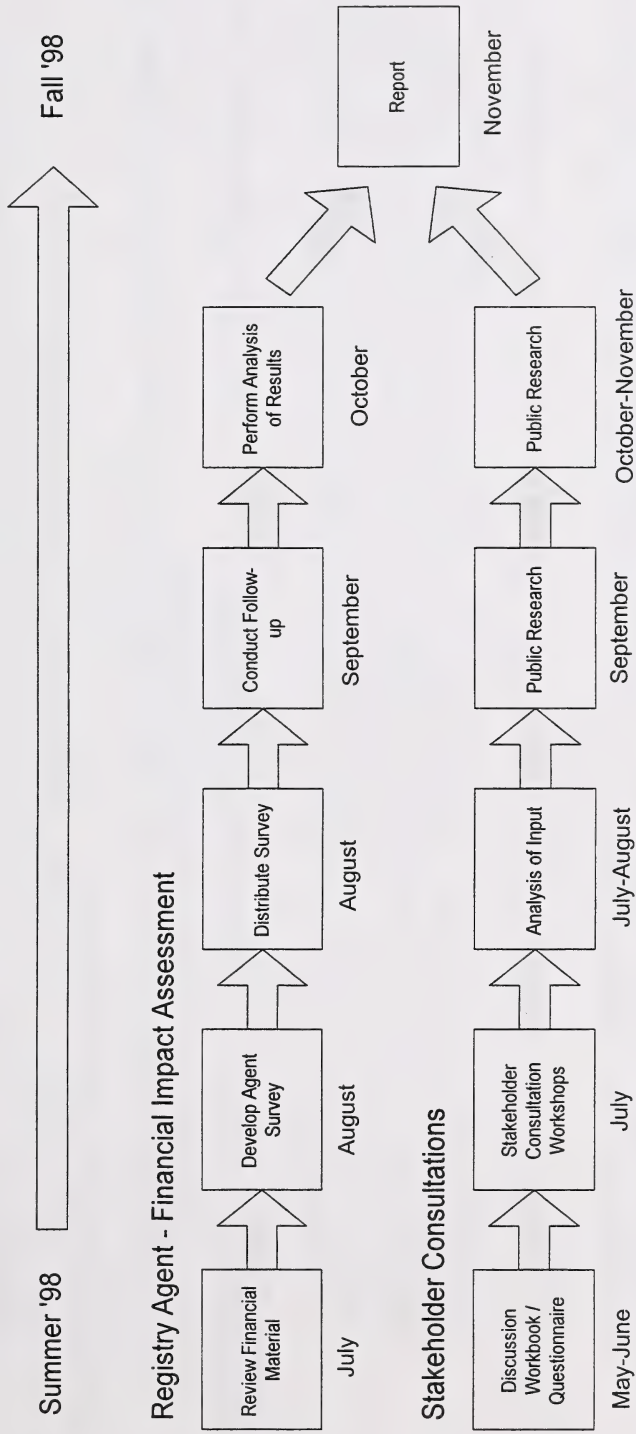
- 14. It is recommended that Alberta Registries strengthen the security measures at private registry agent offices to ensure the protection of personal information.
- 15. It is recommended that Alberta Registries require that each registry agent obtain a signed code of conduct agreement from each employee stating a commitment to abide by the relevant policies and procedures as a means to ensuring that the privacy of Albertans and the security of their personal information is maintained.
- 21. It is recommended that Alberta Registries, in order to improve registry agent service delivery and accountability to the Department, formally communicate to all existing and prospective private registry agents the framework of the registry agents model including the following:
  - the guiding principles of accountability, deregulation, privacy, accessibility, and economy;
  - the legislative and contractual framework;
  - Alberta Registries goals and objectives; and
  - the roles of Alberta Registries and private registry agents in achieving Alberta Registries goals and objectives.



# The Consultation Process

The consultation process for the financial impact assessment will be run in conjunction with the stakeholder consultation process. These consultations have different objectives, and should not be confused. The financial impact assessment focuses strictly on the Registry Agent, and the financial implications that the recommendations will have on your business.

The following is a flow chart of the process and timeline for the financial impact assessment and the stakeholder consultations:





# Questions & Concerns

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At this point, you likely have many questions and concerns. The following is intended to address these questions and concerns:

## Why should I participate?

- Each Registry Agent is unique. We need to have an understanding for a number of Registry Agents, and how these recommendations will impact them. Your input will not only give PricewaterhouseCoopers a better understanding of your registry, but will ensure that we have a representative sample on which to base our conclusions and recommendations in our report to the Minister of Municipal Affairs.

## What is the objective of this consultation?

- To identify costs, both in terms of lost revenue and/or additional expense and associated activities, of implementing each recommendation (impact to Registry Agent).

**This information is private to my business and I may not want to share it with Alberta Registries or other Registry Agents.**

- PricewaterhouseCoopers will be responsible for collecting and analyzing all information. Your individual responses are strictly confidential. Alberta Registries will only receive an aggregate report and no other Registry Agents will receive information on your responses. Once the report is completed, the individual responses will be retained by PricewaterhouseCoopers, as consistent with PricewaterhouseCoopers file documentation and retention policies. However, at no time will any other party, including Alberta Registries or other Registry Agents, have access to the individual responses retained by PricewaterhouseCoopers.

**I already participated in the workshop which looked at some of these recommendations, what happened to this information?**

- Your attendance at the workshop is greatly appreciated, the results from the workshop gave us a starting point for this consultation. At this point we want to dig down into the details of the financial impact of the recommendations on YOUR registry.





## Questions & Concerns

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I don't really understand the recommendations or how they are supposed to affect my customers, which will ultimately affect my income. What do these recommendations mean to my day to day operations?

- Alberta Registries analyzed the recommendations and developed a chart which identifies who currently has access to Motor Vehicle information, what the new standard may look like and what the perceived impact would be in terms of lost revenues and/or additional costs and process changes. This analysis has been included in this workbook on pages 9 through 19 to help you understand the perceived impact of the recommendations.



## Anticipated Standards & Perceived Impact

The following charts represent Alberta Registries analysis of the perceived impact of the recommendations on users of Motor Vehicle information. Please review the following charts which describe anticipated changes to Motor Vehicle information access prior to completing the questionnaire.

Current Standard	Anticipated Standard	Perceived Impact
<b><u>Any standard search report</u></b> may be obtained by: <ul style="list-style-type: none"> <li>Any individual in relation to their own personal information or their own vehicles.</li> <li>Any person with informed consent of the individual to whom the information pertains.</li> </ul>		
<b><u>The Vehicle Information Report</u></b> <b><u>and Vehicle Registration Report</u></b> can be obtained by any person	Informed consent must be obtained in accordance with legislated standards.	No change  See attached excerpt from Section 6 of the FOIP Regulation  No change



# Anticipated Standards & Perceived Impact

Current Standard	Anticipated Standard	Perceived Impact
<p>A <u>Demographic</u> search may be obtained by :</p> <ul style="list-style-type: none"> <li>Any person presenting a court document.</li> <li><u>Private Investigators</u></li> <li><u>Debt Collection Agencies</u> with a Personal Property Registration.</li> <li><u>Post Adoption Search Agencies</u></li> <li><u>Parking Authorities</u></li> <li><u>Building Owners and Managers</u> for parking control</li> <li><u>Bankruptcy Trustees</u></li> <li><u>Insurance Investigators</u></li> </ul>	<p>A <u>Demographic</u> search would only be obtained by:</p> <ul style="list-style-type: none"> <li>Any person in respect to their own personal information.</li> <li>Any Person with the informed consent of the individual to whom the information pertains.</li> <li><u>Lawyers</u> and <u>Insurers</u> who represent parties involved in a motor vehicle accident.</li> <li><u>Bankruptcy Trustees</u> in relation to the bankrupt and their vehicles.</li> <li><u>Bylaw Enforcement Authorities</u> for parking control.</li> <li>Private Investigators and others only to locate missing persons in the context of Section 38(1)q of the FOIP Act.</li> </ul>	<ul style="list-style-type: none"> <li>A court document in itself would not be adequate to obtain a demographic search unless it directs Registries to provide the information or is presented by a <u>lawyer or insurer</u> representing a party to a motor vehicle accident.</li> <li><u>Private Investigators</u> could only obtain a demographic search to locate a missing person in the context of Section 38(1)q of the Act.</li> <li><u>Parking Authorities, Building Owners &amp; Managers</u> could not obtain a demographic search unless they are acting as <u>Bylaw Enforcement Authorities</u>.</li> <li><u>Post Adoption Search Agencies</u> would not be eligible to obtain demographic searches.</li> <li><u>Debt Collection Agencies</u> would be required to have the informed consent of the debtor.</li> </ul>



# Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p>An <u>Operator Search</u> may be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Lawyers</u></li> <li>• <u>Insurers</u> investigating claims</li> <li>• <u>Private Investigators</u></li> </ul>	<p>An <u>Operator Search</u> would only be obtained by:</p> <ul style="list-style-type: none"> <li>• Any <u>person</u> in respect to their own personal information.</li> <li>• Any Person with the informed consent of the individual to whom the information pertains.</li> <li>• <u>Lawyers</u> and <u>Insurers</u> representing parties involved in motor vehicle accidents.</li> </ul>	<ul style="list-style-type: none"> <li>• Access by <u>lawyers</u> and <u>insurers</u> would be restricted to research of motor vehicle accidents.</li> <li>• <u>Private Investigators</u> would no longer be eligible.</li> </ul>





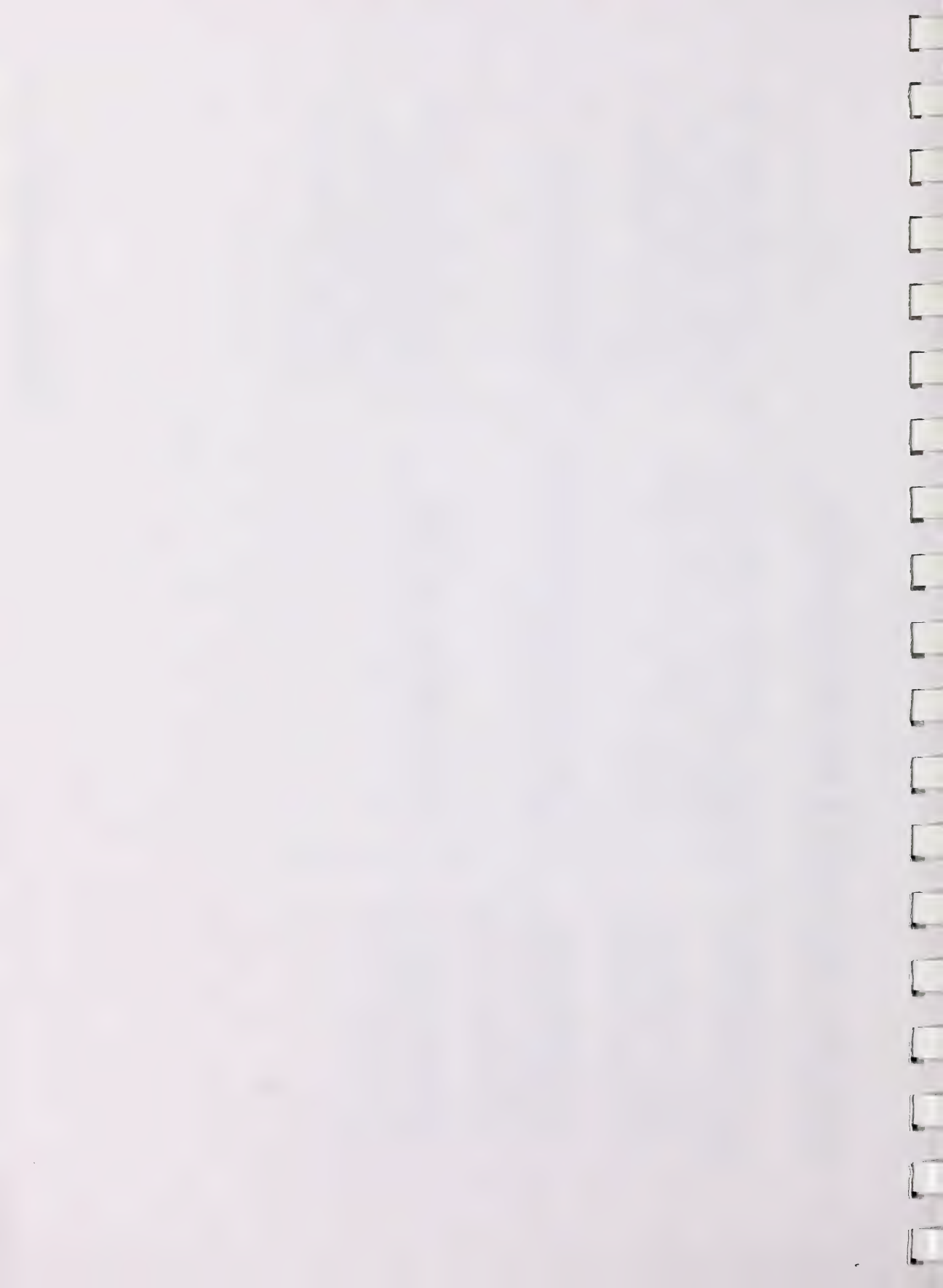
# Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p>A <u>Related Vehicles Search</u> may be obtained by:</p> <ul style="list-style-type: none"><li>• Collection Agencies</li><li>• Small Businesses</li><li>• Financial Institutions with court documents or PPR registrations.</li><li>• Private Investigators</li><li>• Bankruptcy Trustees</li><li>• Law Firms</li><li>• Financial Institutions in respect to Bankruptcy/ receivership.</li><li>• Financial Institutions for verification of collateral</li><li>• <u>Insurers and Private Investigators</u> for insurance investigations.</li></ul>	<p>A <u>Related Vehicle Search</u> would only be obtained by:</p> <ul style="list-style-type: none"><li>• <u>Any person</u> in respect to their own personal information.</li><li>• Any Person with the informed consent of the individual to whom the information pertains.</li><li>• Bankruptcy Trustees in respect to the bankrupt.</li><li>• Lawyers and Insurers representing parties involved in a motor vehicle accident.</li></ul>	<ul style="list-style-type: none"><li>• Collection Agencies, Small Businesses, Financial Institutions and Private Investigators would be able to perform Related Vehicle Searches with the informed consent of the individual.</li><li>• Lawyers and Insurers would only be able to perform related vehicle searches with informed consent or in relation to a motor vehicle accident.</li></ul>



## Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p>A <u>Driver Abstract</u> may be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Insurers</u> with the informed consent of the policyholders.</li> <li>• <u>Employers</u> with the informed consent of the employees.</li> </ul>	<p>A <u>Driver Abstract</u> would only be obtained by:</p> <ul style="list-style-type: none"> <li>• <u>Insurers</u> with the informed consent of each individual to whom the information pertains.</li> <li>• <u>Employers</u> with the informed consent of the employees.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Insurers</u> would require the informed consent of each adult to whom the information pertains, i.e., the policyholder and each adult member of the family.</li> </ul>
<ul style="list-style-type: none"> <li>• A <u>Limited Demographic Search (Electronic Batch Interface)</u> may be obtained by a private parking authority or a bylaw enforcement authority.</li> </ul>	<ul style="list-style-type: none"> <li>• A <u>Limited Demographic Search (Electronic Batch Interface)</u> would only be obtained by a <u>Bylaw Enforcement Authority</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Private parking authorities</u> would no longer be eligible.</li> </ul>
<ul style="list-style-type: none"> <li>• <u>Terminal Access</u> may be obtained by Hospitals and Post Secondary Institutions for the purposes of parking control.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Terminal Access</u> will be more strictly controlled to reduce access to the information which is actually required.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Hospitals and Post Secondary Institutions</u> would have to obtain Limited Demographic Searches through an electronic interface, or obtain a Demographic Search through a registry agent.</li> </ul>



# Anticipated Standards & Perceived Impact

Current Standard	Anticipated Standard	Perceived Impact
<p><b><u>Recording of Personal Information</u></b></p> <ul style="list-style-type: none"><li>• Current policy is not consistently clear and does not distinguish between recording personal identifiers on motor vehicle documents vs. recording personal identifiers for the purpose of cashing cheques and extending credit. Current policy requires agents to record personal identifiers of company representatives.</li></ul>	<ul style="list-style-type: none"><li>• Policy will be clarified to indicate that when identification is provided to obtain motor vehicle services, that only the type of identification would be recorded, not the ID number, except for licence and/or registration numbers from other jurisdictions. Insurance policy details would continue to be recorded. Agents could record personal identifiers on customer cheques and account files in conjunction with their clearly stated cheque acceptance and credit granting policies. Company representatives would be authenticated by correspondence from the company appointing their representatives, and where necessary after that by the representative presenting company of personal identification. Agents would not record any personal identifier numbers from this identification.</li></ul>	<ul style="list-style-type: none"><li>• Policy would be clarified and would distinguish between recording personal identifiers on Registries' motor vehicle records, as opposed to recording identifiers for registry agent business transactions.</li></ul>





# Anticipated Standards & Perceived Impact

Current Standard	Anticipated Standard	Perceived Impact
<p><u>Document Storage</u></p> <ul style="list-style-type: none"><li>• Current policy focuses on the secure storage of controlled inventory rather than securing documents which contain personal information.</li></ul>	<ul style="list-style-type: none"><li>• Policy would be expanded to provide guidelines on handling of motor vehicles and vital statistics documents containing personal information during the working day, at the completion of each working day and on a longer term basis. During the working day, such documents would have to be placed so they would not be read or reached by customers. At the end of each working day, such documents would have to be stored in a securely locked filing cabinet or the equivalent. Long term storage of such documents would have to be secured from unauthorized users. If such documents were stored off-site, they would have to be secured from any unauthorized access, the agent must maintain a listing of such documents and their location at the registry agent's office location. Registries must have access to examine the documents and their storage controls, and the agent must be prepared to bring the documents back to the office if required for review. Digital scanning and storage or microfilming would be acceptable, provided that adequate security measures are in place to secure access.</li></ul>	<ul style="list-style-type: none"><li>• New procedures would be included in policy to govern handling and storage of documents containing personal information.</li></ul>



## Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p><b><u>Password / ID Security</u></b></p> <ul style="list-style-type: none"> <li>Current standards require that system IDs and passwords be kept confidential and outline procedures for resetting passwords.</li> </ul>	<ul style="list-style-type: none"> <li>Registries would establish a single point of contact to obtain new system IDs and to set and reset passwords.</li> <li>Every registry agent office would designate one individual to control the assignment of systems IDs to staff, to maintain an updated log of each ID assignment and to co-ordinate the setting and resetting of passwords.</li> <li>Every staff member in a registry agent office would be required to have their own system ID and password.</li> <li>Password sharing would be prohibited.</li> </ul>	<ul style="list-style-type: none"> <li>The setting and resetting of passwords would occur during regular business hours only, and through one point of contact instead of CSCs or the SHL Help Desk.</li> <li>Every registry agent staff would have their own ID / password.</li> <li>The designated person in every registry agent office would have responsibility for controlling IDs and passwords in the office.</li> <li>ID / password sharing would be strictly prohibited.</li> </ul>



## Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p><b>Office Security</b></p> <ul style="list-style-type: none"> <li>Current policy includes facility standards which outline requirements for secure storage.</li> </ul>	<ul style="list-style-type: none"> <li>Policies on office security would be expanded to include key control procedures and safe combination procedures.</li> <li>A designated person in each registry office would be required to maintain a log of all external door keys and assignment of safe combinations.</li> <li>Upon the termination of any employee who had been issued an external door key or a safe combination, the lock would be changed or the safe combination changed as the case required.</li> <li>Keys to file cabinets containing registries secured inventory or documents containing personal information would be secured at the end of each working day in the safe/secure storage room.</li> </ul>	<ul style="list-style-type: none"> <li>All of the anticipated standards are new. The existing facilities standards would remain unchanged.</li> </ul>

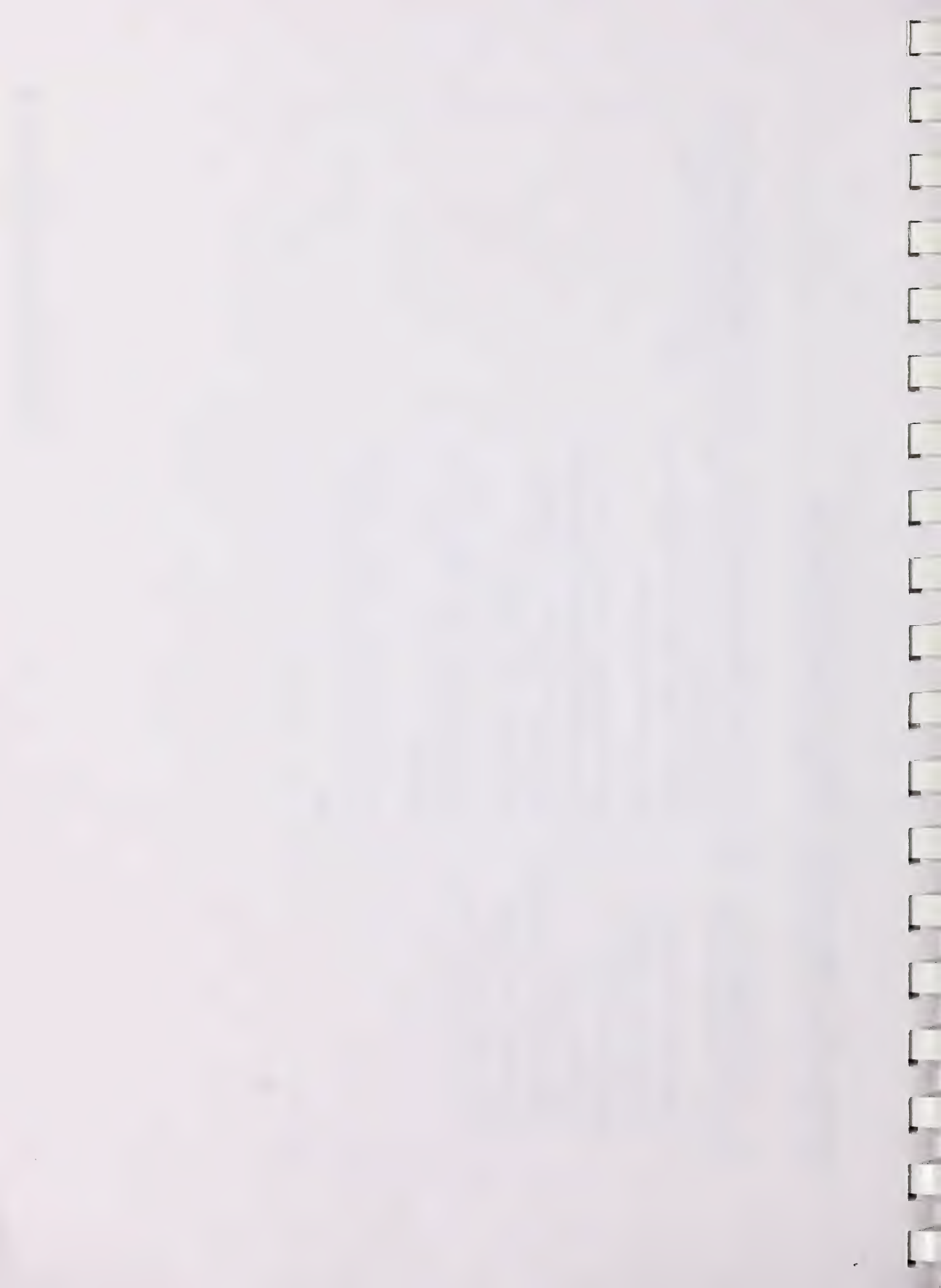




# Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p><u>Code of Conduct Agreement</u></p> <ul style="list-style-type: none"> <li>Current standards do not require any acknowledgement of Registries policies and procedures regarding confidentiality until the employee applies for certification at which time there is a general checklist which confirms awareness of all basic policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Upon commencement, each new registry agent employee would be required to review Registries policies regarding confidentiality and privacy of personal information.</li> <li>Each new employee would be required to sign a Code of Conduct Agreement confirming that they had reviewed the policies and agreed to abide by them. Registries would develop a standard form for this purpose.</li> <li>Each existing registry agent employee would be required to sign a Code of Conduct Agreement.</li> <li>The signed agreements would be maintained on site by agents and would be subject to audit.</li> </ul>	<ul style="list-style-type: none"> <li>The anticipated Code of Conduct process is entirely new.</li> </ul>





# Anticipated Standards & Perceived Impacts

Current Standard	Anticipated Standard	Perceived Impact
<p><u>Legislative and Contractual Framework, Roles and Responsibilities and Principles for the Registry Agent Network</u></p> <ul style="list-style-type: none"><li>• Currently there is no single source of reference for these policies / statements.</li></ul>	<ul style="list-style-type: none"><li>• Registries has developed draft documents to address this requirement. Appended to this workbook are three draft documents which outline Registries' views on these issues. The intent is to incorporate these into Policy and Procedures.</li></ul>	<ul style="list-style-type: none"><li>• The documents are new but reflect existing policies and principles.</li></ul>



## Next Step

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Now that you have reviewed the workbook we would appreciate if you would complete the questionnaire (printed on blue paper). Please follow the instructions located on page 2 of the questionnaire.

Thank you, in advance, for participating in the financial impact assessment. Your responses, combined with other activities being conducted will provide valuable insight into the impact of the Freedom of Information and Protection of Privacy Act on your business.

10/15/11

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